SDMS US EPA REGION V -1

SOME IMAGES WITHIN THIS DOCUMENT MAY BE ILLEGIBLE DUE TO BAD SOURCE DOCUMENTS.

P775 622 574 156165

CERRO COPPER PRODUCTS CO.
P.O. Box 66800
St. Louis, MO 63166-6800
618/337-6000

Certified Mail

December 3, 1992

Ms. Deanne Virgin
Compliance Unit
Planning and Reporting Section
Illinois Environmental Protection Agency
2200 Churchill Road
P.O. Box 19276
Springfield, Illinois 62794-9276

Re: Response to Compliance Inquiry Letter
1631210008-St. Clair County
Cerro Copper Products Co
Sauget, Illinois
ILD080018914

Dear Ms. Virgin:

In response to your November 19, 1992 Compliance Inquiry Letter, enclosed you will find two copies of Cerro's explanation and documentation of compliance to the alleged violations noted during the IEPA's October 20, 1992 inspection.

I. 35 Ill. Adm. Code 722.134 (a)(2)&(3) - Unlabeled Drums

Cerro recognizes that there were two drums stored in the contaminated waste oil storage area which were not properly labeled. Apparently the labels had fallen off, since one of the labels was found on the ground near the drums. Cerro plans to reinforce the importance of labeling with those employees responsible for the storage area. The storage procedures will be posted in the storage area office for frequent review by employees and a sign will be erected outlining the storage requirements including labeling requirements as a reminder. A copy of the posted procedures and a draft of the wording on the sign are found in Appendix A. The sign is expected to be completed by 12/15/92.

II. 35 Ill. Adm. Code 725.152(c) - Contingency Plan Arrangements with Local Hospitals

A copy of the Contingency, Emergency Response & Preparedness Plan is found in Appendix B. The hospital emergency arrangements during medical emergencies is outlined in Section IV, page 3 of the Plan. Cerro has a nurse on staff and a well equipped medical dispensary on its premises.

III. 35 Ill. Adm. Code 725.152(e) - Emergency Equipment Included In Contingency Plan

A copy of the updated Contingency Plan showing the location and

type of emergency equipment is found in Appendix B.

IV. 35 Ill. Adm. Code 725.153(b) - Contingency Plan Copy to the Police, Fire Dept., Hospitals and Local Emergency Coordinator

Cerro's Contingency, Emergency Response & Preparedness Plan was submitted to those agencies listed above on October, 26, 1992. Documentation of receipt is found in Appendix C.

V. 35 Ill. Adm. Code 725.294 - Hazardous Waste Oil Tank Freeboard And Spill Control

A high level alarm system will be installed by 1/1/93 to prevent the overfilling of the waste oil tank and to indicate to the operator that filling is to be discontinued to allow for freeboard. This open topped tank is filled manually without the use of pumps. To prevent the unauthorized filling of the tank and to keep windblown rain from causing overflow, a metal door will be installed along the west side of the tank. The installation of the door is expected to be completed by 1/15/92, weather permitting.

VI. 35 Ill. Adm. Code 725.295(a) - Hazardous Waste Oil Tank Daily Inspections

A copy of the revised hazardous waste storage daily inspection form is found in Appendix D. The new form covers those items in 725.295(a)(1-4). The usage of the new inspection began on 12/3/92.

VII. 35 Ill. Adm. Code 728.107(a)(6) - Land Ban Certification On-Site Copies Retention

A copy of the Land Disposal Restriction notification forms for those missing form our files have been obtained from the disposal site. Copies are found in Appendix E.

If your should have any questions, please do not hesitate to phone this office.

Very truly yours,

CERRO COPPER PRODUCTS CO

Joseph M. Grana
Manager of Environmental
Energy Affairs

cc: Chris Cahnovsky (IEPA-Collinsville)

bcc: P. Tandler (w/o attachments)
R. E. Conreaux " "
J. D. Burroughs (w/attachments)
File "

APPENDIX A

DRUM STORAGE PROCEDURES

HAZARDOUS WASTE STORAGE AREA REQUIREMENTS

Cerro is allowed to store hazardous waste for a period not to exceed 90 days without having a permit. However the guidelines below must be followed for the storage area.

A. Contaminated Waste Oil Tank

1. The contaminated waste oil tank containment area must be maintained free of oil.

2. Daily inspections must be made and recorded daily.

3. If a spill should occur into the containment the material must be removed within 24 hours.

4. The tank and/or the area around the tank must be clearly marked "Hazardous Waste". (265.34(a)(3)

5. The spill and overflow alarm system must be in working order.

6. The tank must not be leaking or rusting and must never be overfilled.

B. Drum Storage

1. All drums holding hazardous waste must be in good condition. Leaking containers must have their contents transferred to another container.

2. A drums holding hazardous waste must always be closed except when removing or adding waste.

3. A drums holding hazardous waste must not be handled in such a way as to cause it to rupture or leak. Do not stack more than two high and always use pallets when stacking.

4. The drum storage area must be inspected weekly.

5. The date upon which accumulation begins must be clearly marked on the drum. This date is the date the waste is placed in the storage area after using the Chlorine test kit to determine if it is contaminated with solvent.

6. The drums is clearly marked "Hazardous Waste". Use the red labels provided. Clean the area to be labeled because it will not stick to an oily surface. Remove the label once the waste is removed from the drum.

APPENDIX B

CONTINGENCY, EMERGENCY RESPONSE & PREPAREDNESS PLAN

CERRO COPPER PRODUCTS, CO.

EMERGENCY RESPONSE

PLAN

EMERGENCY RESPONSE PLAN - DISTRIBUTION

COPY #	
MASTER	SAFETY - J. GEHLHAUSEN
1	R. E. CONREAUX
2	P. TANDLER
3	TUBE MILL OFFICE - E. PERSCHBACHER
4	BUILDING 80 - T. YOUNG
5	BUILDING 19 - M. CHITWOOD
6	TANKHOUSE OFFICE - B. GROVES
7	METAL RECEIVING - R. FOWLKES
8	CENTRAL MAINTENANCE - M. MC NERNEY
9	TUBE MILL MAINTENANCE OFFICE - J. MILLER
10	FOUNDRY MAINTENANCE OFFICE - P. PLUMMER
11	SECURITY - T. HANRATTY
12	PERSONNEL - A. FINKELSTEIN
13	ADMINISTRATION OFFICE - E. KING
14	SALES OFFICE - F. MURPHY
15	ENGINEERING - J. HINTZ
16	J. R. MATCUK
17	H. L. SCHWEICH
18	REFINERY & FOUNDRY OFFICE - J. DAVIS
19	CENTRAL MAINTENANCE - R. THOMPSON
20	SAFETY - S. BAHNO
21	TRAINING - B. NOVACK
22	LABORATORY - J. SCHUSTER
23	TUBE MILL OFFICE - S. FULLER/K. WISECARVER
24	ANODE - J. FERRELL

EMERGENCY RESPONSE PLAN

TABLE of CONTENTS

Revision 1
12/3/90

CERRO COPPER PRODUCTS

EMERGENCY RESPONSE PLAN

PURPOSE

This plan covers the response necessary in case of any occurrence which may endanger employees on a large scale and/or do major damage to Plant buildings, utilities and equipment.

The Plan covers:

1. Natural disasters such as earthquake or tornado.

2. Major fire or explosion internal or external to the Plant.

3. Toxic discharges from neighboring industries.

GENERAL

For the purpose of describing the response necessary, the severity of the situation must be considered. For the purpose of this plan, three levels are established:

LEVEL ONE - Damage is minor and is essentially of a localized nature if it does occur. Response for the most part may consist of first aid or medical assistance for a few employees and minor repairs to equipment. Assistance from local emergency agencies may be necessary. Previously designated Management personnel should be notified.

LEVEL TWO - Damage is relatively widespread but for the most part not life threatening. Assistance from local emergency agencies is necessary but may not be quickly available because of other calls. Key Management personnel will be notified and will attempt to reach the Plant if possible. Organized response on a plant wide basis will be necessary. Heavy windstorms, earthquakes with an intensity of 6 to 7 on the Richter scale, serious problems at neighboring industries, etc. would fit this level.

LEVEL THREE - Damage and injury are widespread. Assistance from local emergency agencies is needed but probably not available for some time. Organized response on a plant wide basis is necessary to help the injured, avoid secondary fires and explosions, limit the exposure to electricity, and fight fires. Tornados, major earthquakes and similar disasters are Level Three.

RESPONSIBILITIES AND DIRECTION OF ASSISTANCE

LEVEL ONE - Production and Maintenance Supervision within the Departments affected will handle the situation with proper notification to Security and designated Management and Safety Department Personnel. During normal business hours the various Maintenance and Production Supervisors, General Foreman and Managers will coordinate their efforts. At night the Tube Mill General Foreman will have overall responsibility for the Tube Mill. Foundry and Refinery Supervisors will coordinate with Maintenance Supervision in their areas.

LEVEL TWO AND THREE - A command post will be set up:

DURING NORMAL BUSINESS HOURS - The command post will be in the Plant Manager's office and adjoining offices. It will be moved to the closest suitable building if those offices are severely damaged. Radio communications will be set up on the various plant channels and the Engineering and Maintenance Managers will direct their staffs from this location.

NIGHT TIME DURING THE WEEK - The command post will be set up in the Security Department and the Security Director's office. The Tube Mill General Foreman will assume overall plant responsibility until relieved by a senior plant official. He will move the command post to another close-by location if necessary. Radio communications will be set up on the various plant channels.

WEEKENDS AND HOLIDAYS - If a General Foreman or other Management personnel are not present, then the senior Maintenance Department Supervisor will take overall responsibility until relieved. The command post will be set up at Security as described above.

PRIORITIES - The procedures of this plan are intended to accomplish the following:

1. PREVENTION OF SECONDARY FIRES AND EXPLOSIONS - Depending on the severity of the situation, it may be necessary to shut off part or all of the natural gas, electricity and other utilities to prevent additional injury or damage.

2. RESCUE AND FIRST AID - Freeing and treating injured personnel will be given the highest priority with the exception of making it safe to do so.

3. EVACUATION IF NECESSARY.

4. EXTINGUISHING OF FIRES AND SECURING OF OTHER UTILITIES AND EQUIPMENT IF NECESSARY.

5 INSPECTION OF BUILDINGS AND EQUIPMENT TO ASSESS DAMAGE AND TO DETERMINE IF THEY ARE SAFE TO ENTER OR USE.

6. ASSISTANCE TO UNINJURED EMPLOYEES - A small supply of water, food and shelter will be available in the plant in case some employees are unable to leave because of transportation problems and employees remaining to assist at the plant.

CERRO COPPER LEVEL 3

EMERGENCY RESPONSE PROCEDURE

A. Shut off earthquake valve G1 and Cerro supply valves G2 and G3 to stop flow of natural gas. These valves are located at the gas house behind the Tube Mill.

B. Isolate liquid oxygen facilities next to Sales Office and at Bldg. #19. Shut both valves off.

C. Isolate propane tank next to parking lot by shutting off valve at bulk tank.

D. Isolate hydrogen trailers on road behind Tube Mill by closing shutoff valves.

E. Water can be shut off by closing valves indicated as W9, W10 and/or W1 on utilities drawing. Unless it is an extreme emergency, do not shut off W9 or W10 before contacting Illinois American Water Company 277-7450.

F. Power can be isolated by dropping any or all of the four main feeders located next to the fence between the Sales Office and the Cafeteria.

TECHNICAL SERVICES 1990

10/7/91
Revised 10/23/92

EMERGENCY COORDINATORS

HAZARDOUS WASTE CONTINGENCY EMERGENCY & PREPAREDNESS PLAN

IN CASE OF:		HOME PHONE
MAJOR PLANT BREAKDOWN INCLUDING BROKEN GAS OR WATER LINES:	1 st - Maint. Supv. on duty in plant 2 nd - Maint. General Foreman or Supt. on call. 3 rd - M. McNerney 4 th - R. Thompson (electrical)	
FIRE OR SERIOUS ACCIDENT: (call all three)	1 st - J. Gehlhausen 2 nd - P. Tandler 3 rd - R. Conreaux 4 th - A. Finkelstein	
ENVIRONMENTAL ALERT, SPILL, ETC.	1 st - J. Grana 2 nd - P. Tandler 3 rd - R. Conreaux 4 th - J. Burroughs	
WASTEWATER SEWER PROBLEM: (If Maint. Supr. not available.)	1 st - T. Cornwell 2 nd - J. Staples	

PLANT PHONE NUMBER - 618/337-6000

A CALL TO CERRO"S SECURITY DEPARTMENT AT THE NUMBER WILL PROVIDE ACCESS TO THE EMERGENCY COORDINATORS LISTED ABOVE.

EMERGENCY EVACUATION PLAN

GENERAL

Depending on the type and degree of any emergency situation, a partial or full evacuation of one or several buildings may be called for. The Emergency Coordinator, or in his absence, his designated representative, may order a building or plant evacuation as he deems necessary.

Should an evacuation be ordered, employees will proceed in a prompt and orderly manner to their designated Safe Area.

DESIGNATED SAFE ASSEMBLY AREAS

1. Designated Safe Areas have been established throughout the plant facility (refer to facility and individual building diagram maps for locations).

2. All employees will be assigned a designated Safe Area in which to assemble in the event of an evacuation.

EVACUATION ROUTES

1. Each department shall ensure all of its employees have been trained and clearly informed of the location they are to assemble, and the various routes available should an evacuation be ordered.

2. Evacuation route maps for each department/building shall be clearly posted for employees to review.

EVACUATION RESPONSIBILITIES

1. Every Supervisor is to keep a copy of the daily shift schedule for his area in his possession. Each Department shall maintain a master list of employees including their shift assignment. These lists will be utilized to do a first and final accounting of all hourly employees. In the case of an emergency, the Department master list will be brought to the Emergency Control Center by a Supervisory employee familiar with it.

2. Each Supervisor will be responsible for evacuating the employees under his supervision to the appropriate designated safe area for his Department. A head count will then be made with a check placed next to each person present or, if not present but accounted for, an appropriate remark such as, "Absent from work," will be made. If an employee is out of his assigned work area when an evacuation is called, he will report directly to his designated Safe Area. If unable to do so, he will report to the nearest Supervisor in any Safe Area, who will then note the employee's name, number and Supervisor on his list and notify the Command Center. If an employee is unaccounted for the Supervisor will immediately alert the Emergency Coordinator or his staff in the Command Center and will initiate an immediate search if it is safe to do so. The Emergency Coordinator and his staff will provide additional search and rescue assistance if the employee has not been reported in another area.

3. Each Department Head or Senior Supervisor will be responsible to make a head count of salaried department personnel and report the status.

3. Each Department Head or Senior Supervisor will be responsible to make a head count of salaried department personnel and report the status.

4. After the head count the marked schedule lists will be carried to the Command Center. The Supervisor familiar with the master list or a staff member will copy the information onto the department roster in order to double check for the accountability of all personnel. It will be important to report any personnel who may be found outside their normal evacuation area such as those on lunch break. Every effort will be made to account for every hourly and salaried employee.

5. Any employee leaving the facility during an emergency requiring an evacuation shall give his name and employee number to the Security Guard at the Main Plant entrance. Employee numbers and/or names obtained by the Security Guard will be forwarded to the Emergency Coordinator in the Command Center.

6. Evacuation of plant visitors shall be the responsibility of the party being visited.

7. All outside contractors shall be appraised of the Emergency Evacuation Plan and evacuation routes by the Project Engineer.

EVACUATION RULES TO FOLLOW

1. Evacuate in an orderly manner. Walk, don't run.

2. Do not attempt to drive a vehicle to your designated Safe Area. There will be too much pedestrian traffic and confusion to safely have a vehicle moving about.

3. All vehicle movement must come to a stop during an evacuation. Shut the engine off and set the brake.

4. After performing emergency shutdown duties, proceed directly to your designated Safe Area. Do not "lollygag", since a headcount will be taken to make sure everyone got out of their area safely.

5. Do not leave the plant property. We must account for everyone.

6. Do not stay in your work area during an evacuation. If an evacuation is ordered, the condition is considered serious. Get out and head to your designated Safe Area.

7. Do not re-enter any buildings that have been evacuated until the "all clear" is announced.

8. Hard hats and safety glasses must be worn at all times during an evacuation.

9. Horseplay of any kind is forbidden during an evacuation.

10. Departments are to maintain an up to date roster of their employees in order to take a proper and accurate head count.

11. The supervisor on duty has the responsibility for evacuating the employees from his work area. If an employee has a walking handicap, that employee shall be evacuated first.

12. The head count will be the responsibility of the senior supervisor in each designated Safe Area. A list of assembled employees for each area shall be forwarded to the Emergency Coordinator in the Command Center.

13. Plant visitors shall evacuate with the party they are visiting.

14. Outside contractors working in the plant are to be appraised of the evacuation plan and routes by the Project Engineer. They will be expected to evacuate in the same manner as Cerro Copper employees.

15. After announcing the evacuation, one supervisor must remain behind long enough to check for stragglers. When he is sure everyone is out of the area, the supervisor shall evacuate to the designated Safe Area.

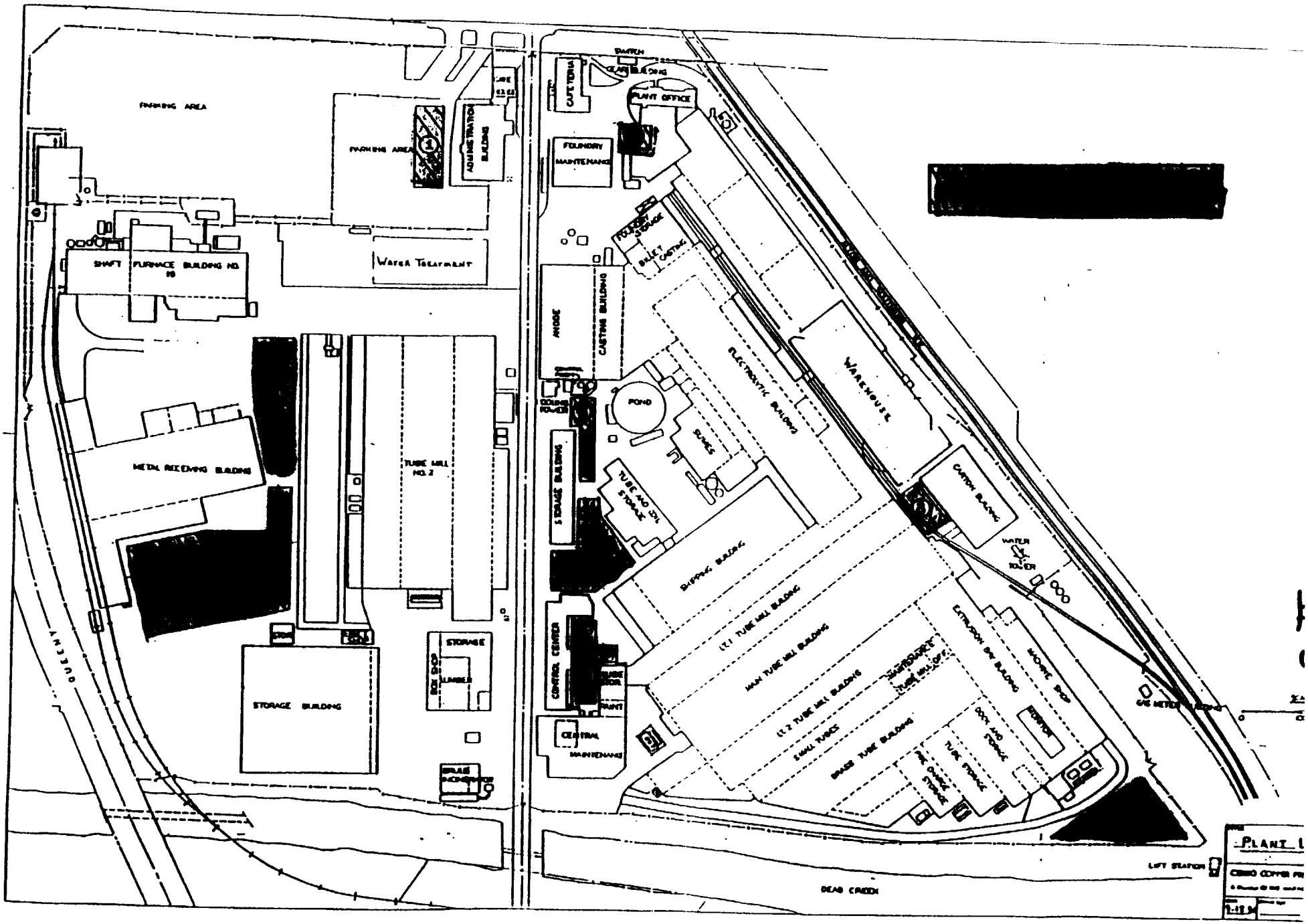
16. Only designated emergency personnel will be allowed to enter any evacuated buildings.

17. All plant roadways shall be kept open during an evacuation for movement of emergency vehicles.

EVACUATION PLAN

Designated Safe Areas

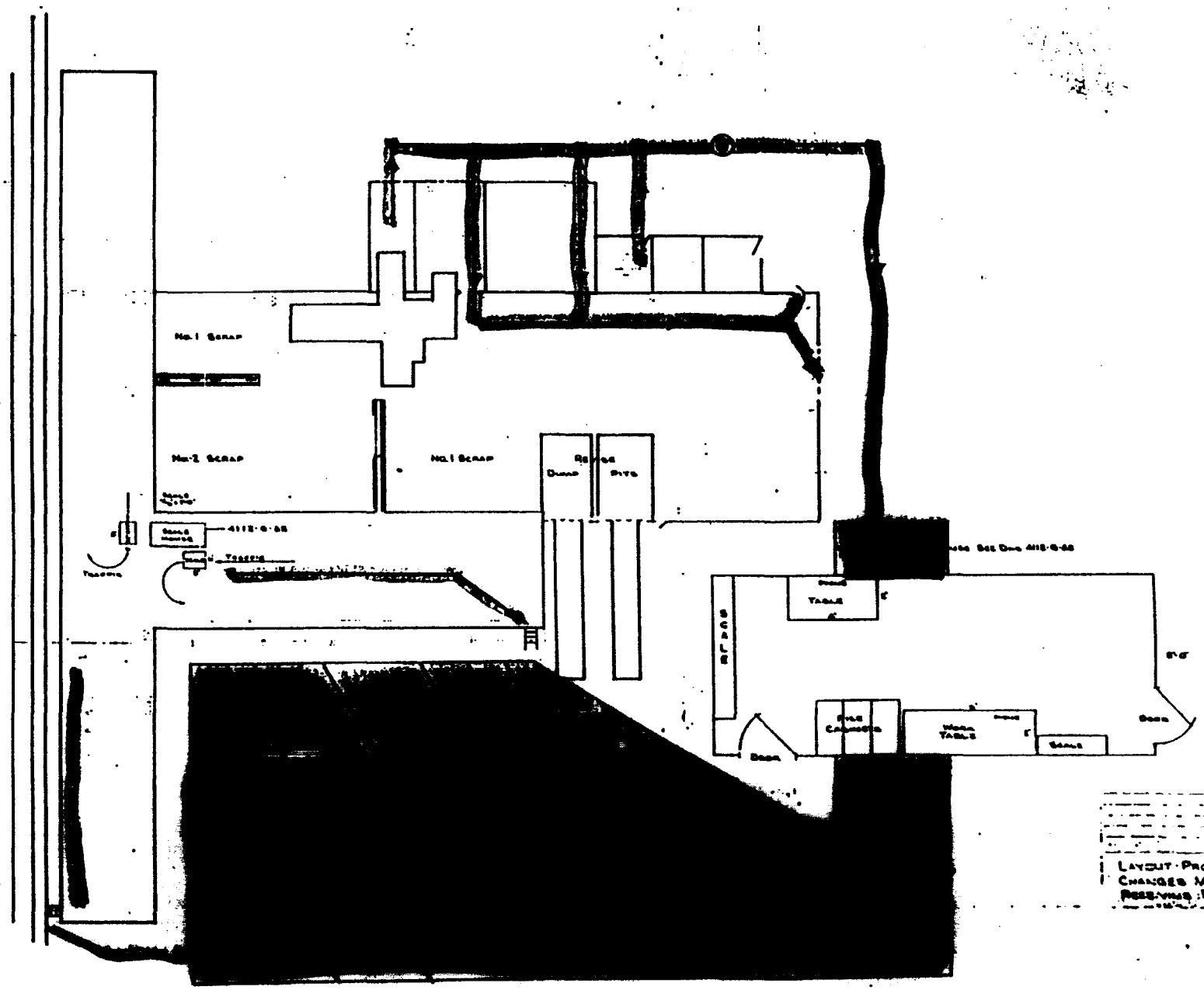
Building-Department/Work Area	Designated Safe Area
Administration - General Administration	1
Personnel	1
Plant Office - Sales	7
Cafeteria	7
Control Center - Laboratory	5
Safety/Environmental	5
Engineering	4
Building 19 & Spotters	2
Metal Receiving	3
Anode	6
Tankhouse & Slimes/SX	6
Tube Mill - All Work Areas	4, 5, 8 or 9
Shipping & Spotters	5
Building 80 and Box Shop	2 or 3
Maintenance - All Maintenance Personnel	4
Central Stores	4
Tube Coil Storage Bldg. - Technical Services	4
Storage Building - Lab Storage	5 or 6
Cart Repair Shop	4
Refractory Shop	5 or 6
Water Treatment Plants	2
Yardcrew Laborers	5


PARKING AREA
PARKING AREA
ADMINISTRATION BUILDING
CAFETERIA
PLANT OFFICE
FOUNDRY MAINTENANCE
SHAFT FURNACE BUILDING NO. 10
WATER TREATMENT
ANODE
CASTING BUILDING
POND
ELECTROLYTIC BUILDING
WAREHOUSE
METAL RECEIVING BUILDING
TUBE MILL NO. 2
STORAGE BUILDING
STORAGE
BOX SHOP
LUMBER
CONTROL CENTER
CENTRAL MAINTENANCE
SHIPPING BUILDING
MAIN TUBE MILL BUILDING
SMALL TUBES
DRAW TUBE BUILDING
MACHINE SHOP
CARTON BUILDING
QUEEN
BEAR CREEK
LIFT STATION

TUBE AND COIL STORAGE
WAREHOUSE
CARTON BUILDING
LEAN TO NO 2
S500
S600
S300
STORAGE

9-11

E-1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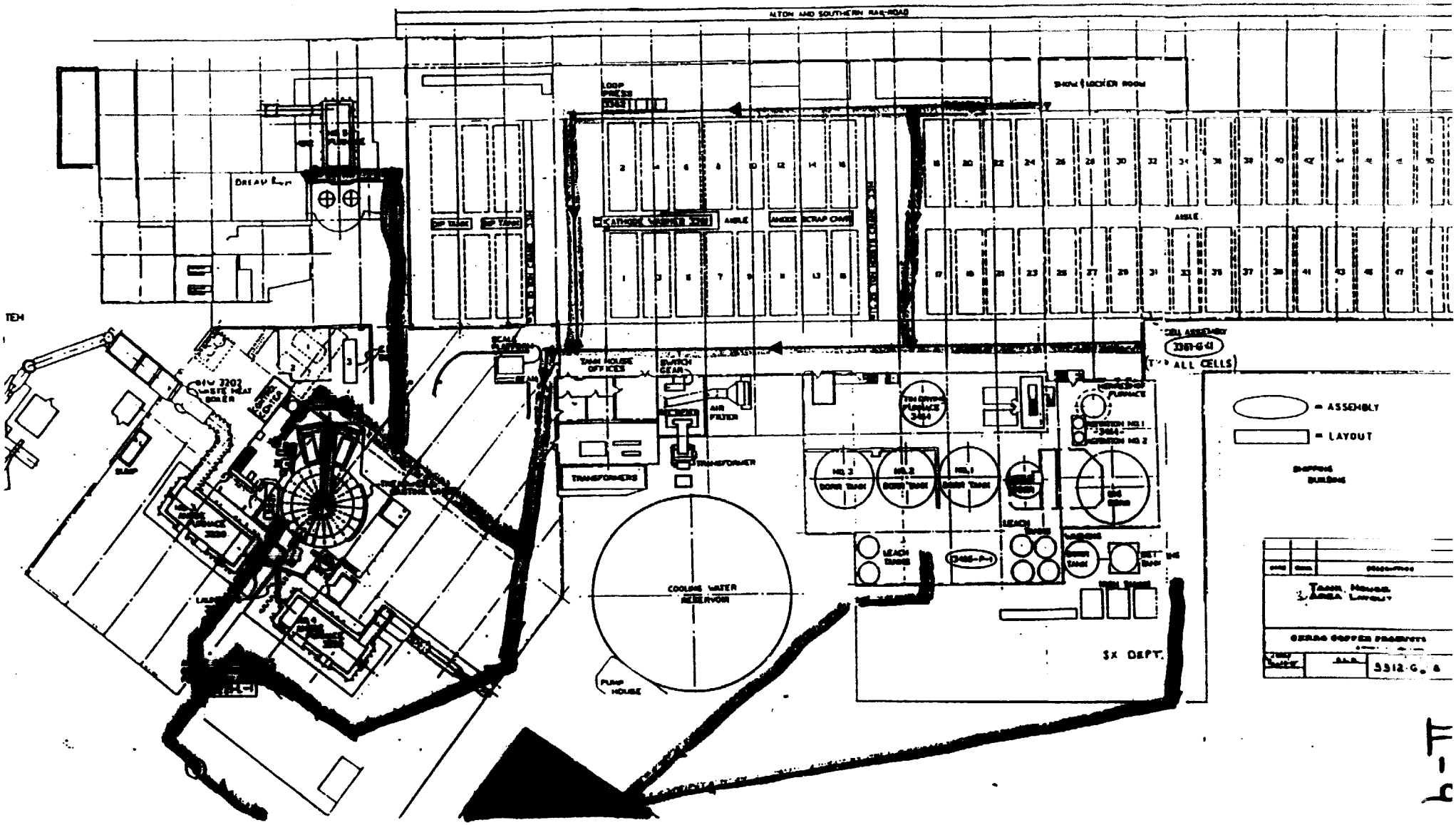
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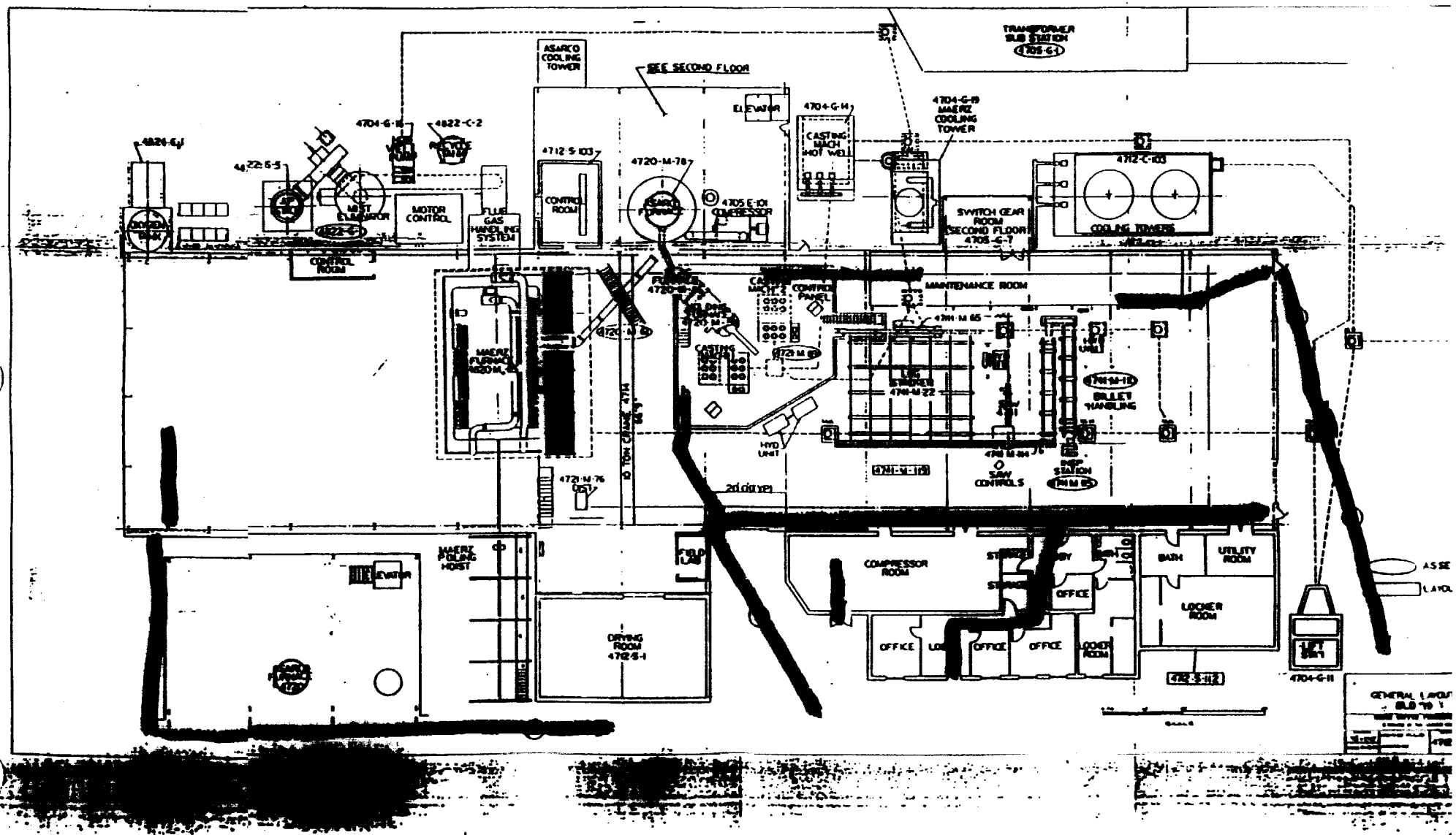
SHOW LOCKER ROOM
DREAM ROOM
CATHODE WASHER TANK
ANODE SCRAP CHAIN
AISLE
TANK HOUSE OFFICES
SWITCH GEAR
AIR FILTER
TRANSFORMER
TRANSFORMERS
COOLING WATER RESERVOIR
PUMP HOUSE
SX DEPT.
= ASSEMBLY
= LAYOUT


TRANSFORMER SUB STATION
4705-G-1
ASARCO COOLING TOWER
SEE SECOND FLOOR
ELEVATOR
4704-G-14
CASTING MACH (HOT WELL)
4704-G-19 MAERZ COOLING TOWER
4712-C-103
4720-M-78
4705 E-101 COMPRESSOR
4712-C-105
COOLING TOWERS
SWITCH GEAR ROOM SECOND FLOOR 4708-G-7
4704-G-18
4822-C-2
MIST ELIMINATOR
4822-G
MOTOR CONTROL
FLUE GAS HANDLING SYSTEM
CONTROL ROOM
MAINTENANCE ROOM
CONTROL PANEL
MAERZ FURNACE ROOM M-15
CASTING MACH 2
CASTING MACH 1
4711-M-65
4711-M-22
BILLET HANDLING
4711-M-19
HYD Unit
10 TON CRANE 4711
4711-M-105
SAW CONTROLS
4711-M-76
2nd LEVEL
MAERZ FOLDING HOIST
ELEVATOR
COMPRESSOR ROOM
STORAGE
OFFICE
BATH
UTILITY ROOM
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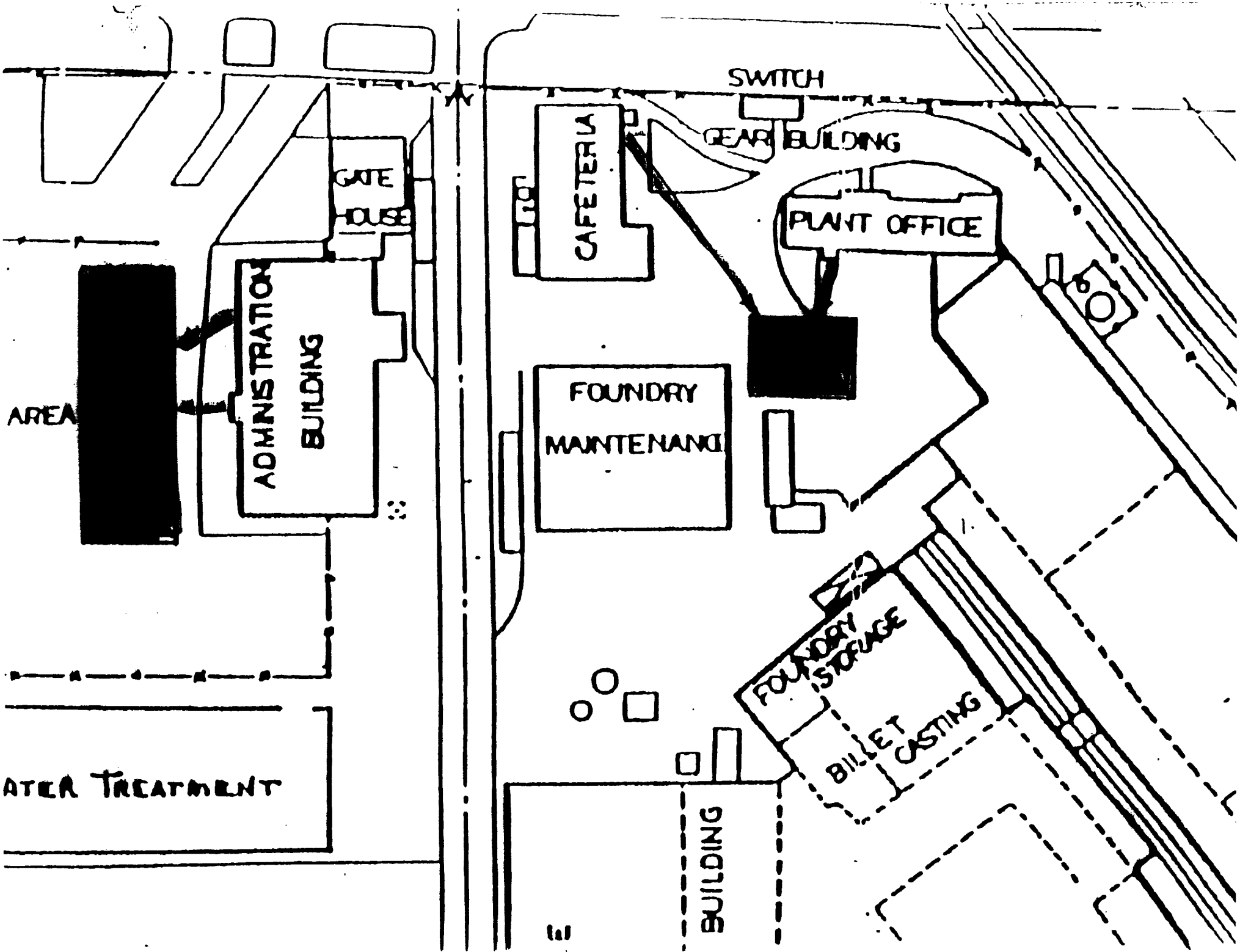
SWITCH
GEARS BUILDING
GATE HOUSE
CAFETERIA
PLANT OFFICE
ADMINISTRATION BUILDING
FOUNDRY MAINTENANCE
FOUNDRY STORAGE
BILLET CASTING
BUILDING

I. LEVEL ONE - MINOR DAMAGE

A. Normal Business Hours

1) The Safety Director and Plant Nurse will be called to the area by dialing extension 210 to coordinate the care of the injured.

2) The Safety Engineer and Training Officer will assess and secure the area to prevent additional injuries. Injured employees will be moved to a safer area if deemed unsafe by the medical staff or supervisor in that area.

3) Medical supplies from the Dispensary will be used for treating the injured.

4) Security will call for an ambulance if requested by the medical team.

B. Night Time, Week-end and Holidays

1) Supervisors in the area will coordinate with personnel from Central Stores and Lab to treat the injured employees.

2) The triage team will determine the most suitable area for treatment and if it is necessary to transport the injured to the hospital.

3) Security should be contacted by the triage team if an ambulance is necessary.

II. LEVEL TWO AND THREE - WIDESPREAD DAMAGE

A. Normal Business Hours

1) The Control Center will be the designated area for triage of all injured employees.

2) The Safety Director and Plant Nurse will coordinate with the personnel from Central Stores and the Lab in assessing and treating the injured.

3) Emergency medical supplies stored in the Lowry Building will be brought to the Control Center by the medical staff. An electric cart or other means of transportation should be provided for this if possible.

4) The Safety Engineer, Training Officer and Environmental Staff will coordinate with the Command Post to assist in extricating and transporting the injured to the triage area.

5) Clerical personnel from the Dispensary and Lab will immediately start documenting all actions and responses during the disaster.

B. Night Time, Week-ends and Holidays

1) Personnel from Central Stores and the Lab will coordinate with the Command Post or designated personnel in charge to set up a triage area in the Control Center.

2) Security will unlock all areas in the Control Center needed to adequately treat the injured.

3) Emergency medical supplies stored in the Lowry Building will be brought to the triage area immediately by medical personnel. Security will have to unlock the Lowry Building.

4) The first response medical team will begin triage as soon as is possible. Assistance from other members of the medical or management staff will be made available as soon as is practical and their efforts will be coordinated.

1. DISPENSARY VISIT AUTHORIZATION SLIP

TO BE TREATED IN THE DISPENSARY, THE EMPLOYEE MUST PRESENT THIS SLIP FROM HIS SUPERVISOR UNLESS IT IS AN EMERGENCY. NO SLIP - NO TREATMENT !

2. NON-OCCUPATIONAL INJURY/ILLNESS

A. QUESTION THE EMPLOYEE TO FIND OUT WHERE THE INJURY OCCURRED. LET THEM TELL YOU IN THEIR OWN WORDS. GET A DEFINITE STATEMENT OF TIME AND PLACE.
B. IF THE INJURY DID NOT HAPPEN AT WORK, BE SURE TO NOTE THAT ON THE DISPENSARY LOG. MINOR FIRST AID CAN BE GIVEN (BANDAGES,ETC.), BUT REFER EMPLOYEE TO HIS FAMILY DOCTOR FOR CARE.
C. IF THE EMPLOYEE IS SICK, THAT SHOULD BE NOTED ON THE DISPENSARY LOG. THEY CAN BE GIVEN NECESSARY MEDICATION, BUT IF THEY ARE ASKING TO BE SENT HOME (ON2ND OR 3RD SHIFT), THEY SHOULD BE SENT BACK TO THEIR SUPERVISOR TO MAKE THAT DECISION.
D. IF THE EMPLOYEE CAN'T DRIVE HOME, TRANSPORTATION SHOULD BE ARRANGED.

3. DISPENSARY LOG

A. LOG ALL DISPENSARY VISITS AND FILL IN ALL REQUIRED INFORMATION.
B. BE SURE TO PUT DOWN THE EXACT INJURY LOCATION: WHICH HAND, WHICH FINGER, ETC.

4. HOSPITAL CASES (OR CLINIC)

A. IF AN EMPLOYEE IS SENT TO THE HOSPITAL, BE SURE TO MARK IT ON THE DISPENSARY LOG.
B. WHEN AN EMPLOYEE RETURNS FROM THE HOSPITAL, MARK ON THE DISPENSARY LOG HIS RETURN TIME AND IF HE WENT HOME OR RETURNED TO WORK.
C. USE MEMORIAL HOSPITAL IN BELLEVILLE. SEND TO ST. MARY'S IN EAST ST. LOUIS ONLY IN DIRE EMERGENCY WHEN TIME IS CRITICAL.
D. THE NORMAL MEANS OF TRANSPORTATION TO THE HOSPITAL IN NON-EMERGENCY CASES IS BY SERVICE CAR FROM BRAUN FUNERAL HOME.
E. NOTIFY HIS SUPERVISOR WHEN YOU SEND AN EMPLOYEE OUT OF THE PLANT.
F. WHEN AN EMPLOYEE IS SENT TO THE HOSPITAL, USE THE "HOSPITAL TREATMENT AUTHORIZATION FORM". WHEN HE RETURNS TO THE DISPENSARY, SEND A COPY TO HIS SUPERVISOR AND LEAVE A COPY IN THE DISPENSARY.

5. AMBULANCE

A. CALL THE GUARDS TO CALL THE AMBULANCE. THEY MUST KNOW THE AMBULANCE IS ON ITS WAY IN ORDER TO CLEAR A PATH THROUGH THE GATE.
B. USE BRAUN FUNERAL HOME AS THE PRIMARY SOURCE FOR AN AMBULANCE. OTHERS ARE LISTED.

6. FOLLOW-UP CARE

WHEN AN EMPLOYEE RETURNS TO THE DISPENSARY FROM THE HOSPITAL OR CLINIC, WRITE THE TIME THAT HE RETURNED ON THE LOG AND WRITE, "GIVEN FOLLOW-UP CARE SHEET". THEN GIVE HIM A COPY OF THE FOLLOW-UP CARE INSTRUCTION SHEET.

7. EYE INJURIES

SEND EYE INJURIES TO MEMORIAL HOSPITAL.

Revised 4/9/92

CERRO COPPER PRODUCTS CO.

EMERGENCY RESPONSE PLAN

"COMMUNICATIONS"

LEVELS TWO AND THREE

RESPONSIBILITIES

A. **Normal Business Hours:**
A command post will be set up in the Plant Manager's Office and in the adjoining offices; if these offices are severely damaged, the Command Post will be moved to the closest suitable building.

B. **Night Time During the Week:**
The Command Post will be set up in the Security Dept. or another close by location as is necessary.. The Tube Mill General Foreman will assume overall plant responsibility until relieved by a senior plant official.

COMMUNICATIONS

A.* A 3-channel racio will be taken from the Plant Nurses Office by the Training General Foreman and delivered to the Command Post. The radio will switched to Channel 1 (Plant Maintenance Channel.

* Channel 1-Maintenance
Channel 2-Security,Receiving,Shi
Channel 3-Safety

There are 3 more Safety Dept. Radios:

1. Safety Manager
2. Safety Engineer
3. Training General Foreman

These indivicuals will maintain their racios on Channel 1 also.

The Training General Foreman will also get a second radio from either Shipping or Metal Receiving and take to the Command Post. This radio will be for open communications with Security.

B. A Security Officer will get a safety radio from the Plant Nurse's Office, give to the Tube Mill General Foreman. This radio can be operated off Channel 1 - Maintenance Channel 2 - Security.

Security will also activate their Maintenance racio at the Command Post.

. **Weekends and Holidays:**

If a General Foreman or other management personnel are not present, then the senior Maintenance supervisor will assume overall plant responsibility until relieved. The Command Post will be set up at Security or another close by location.

Refer to "B" for Radio Distribution and Use

CERRO COPPER PRODUCTS CO.

RADIO COMMUNICATIONS UPDATE - 4/9/92

DEPARTMENT	# of RADIOS	TYPES OF RADIOS	COMMUNICATE TO	POWER SOURCE	USED BY + STORED WHERE
Metal Rec.	3	1 Motorola HT500	Security, Receiving Spotters, Shipping	NKD Battery from charger at Security	1st Shift Spotter
		1 Motorola HT600	" "	Battery pack charger in Receiving Office	Receiving Supervisor
		1 Motorola HT90	" "	" "	1st Shift Spotter
Security	3	1 Motorola	Security, Receiving, Spotters, Shipping	NKD Battery from charger at Secuity	Security officers all 3 shift w/battery charges from wall charger as needed.
		2 Maxons	" "	Batterys and individual chargers.(extras)	(Extras) kept in Security Mgrs office w/individ charger
		2 Maintenance Radios 2 - Base Stations - 1	" "		In Security Mgr's office
		- 1	Sauget Village Fire & Police Dept.		All Security personnel at Security Station
Shipping	6 *	1 Motorola Sabre	Security, Receiving Spotters, Shipping	Battery & individual charger	Shipping supervisors (all 3 shifts)
		1 Motorola Sabre	" "	" "	Spotters
		1 Motorola HT500	" "	NKD Battery from charger at Security	(spare)
		1 Maxon	" "	Individual charger	spare-currently out for repa
		2 Maxons	" "		(spare) Radio & charger kept in Shipping Office
*All of these radios are kept in the Shipping Office					
Maintenance	12	1 Motorola MT500	All Maintenance & Central Stores phone	Individual charger	Palmer Plummer- Foundry Maint. Office
		1 Motorola HT220	" " "	" "	B.Eichelman- " "
		1 Motorola MT500	" " "	" "	S.Whiteside- " "
		1 Motorola Expo	" " "	" "	J. Sodam-J Sodam's office at Central Maintenance
		1 Motorola HT220	" " "	" "	Tractor Mechanic, 1st shift locked steel cabinet

* NOTE: These radios are also used on 2nd and 3rd shift by R. Riden & Ray Thorsten.

DEPARTMENT	# of RADIOS	TYPES OF RADIOS	COMMUNICATE TO	POWER SOURCE	USED BY + STORED WHERE
Maint. - cont'd		1 Motorola Expo	All Maintenance & Central Stores phone	Individual Charger	R. Thompson - R. Thompson' office at Central Maintena
		1 Motorola Expo	" " "	" "	H. Flynn-Harold's locker a Central Maintenance
		1 Motorola Expo	" " "	" "	Jay Miller's office at Tub Mill Maintenance
		1 Motorola Expo	" " "	" "	B. Faries' office at Centr Maintenance
		1 Motorola HT500	" " "	NKD Battery from charger rack at Central Maintenance	D. O'Neal's office in Building 80
		1 Motorola HT220	" " "	Individual Charger	E. McDonald-J. Millers' of in Tube Mill Maintenance
		1 Motorola MT500	" " "	" "	R. Schwoebel-J. Millers'of in Tube Mill Maintenance
Safety	4	General Electric 3-channel	Maintenance Security Shipping Metal Receiving Safety	NKD Batteries with chargers	J. Gehlhausen) in John Ge B. Novack) hausen's o S. Bahno - S. Baho's offi Carol Millard - Dispensar

NOTE: In all instances Maintenance has 12 radios for their use and will coordinate their own distribution.

SUMMARY

LEVEL TWO AND THREE

RESPONSIBILITIES	COMMUNICATIONS
A. **Normal Business Hours:** Command post in Plant Manager's Office	A. Command Post needs: 1 - Security Radio 1 - Maintenance Radio Safety/Medical needs: 4 - Shipping/Receiving Radios Training General Foreman, Shipping. and Receiving General Foremen to deliver.
B. **Nighttime During the Week:** Command post in Security. TM General Foreman responsible.	B. TM General Foreman needs: 1 - Shipping Radio There is a Maintenance radio in Security.
C. **Weekends - Holidays:** Command post in Security. Senior Maintenance Supervisor responsible.	C. 1 - Shipping or Receiving Radio. There is a Maintenance radio in Security.

NOTE: The responsible people (especially at night and on weekends) must be prepared to delegate radio deliveries and pickups promptly.

V-6

CERRO COPPER PRODUCTS CO.

INTERNAL MEMORANDUM

TO: Roy Thompson 1/2/91

FROM: Allen Feltz

SUBJECT: Power Failure Phone Extensions

The following is a list of power failure phone extension numbers and their location:

Number	Location
268	Maintenance Office
303	Paul Tandler's Office
344	Al Finkelstein's Office
359	Security
380	Outside Bob Conreaux's Office
391	Electrical Switchgear Bldg.

A. PREVENTION

Good plant housekeeping is the best protection against fire. You are expected to do your part by the disposal of all combustible scrap, rags, paper products and other flammable materials.

A common source of fire is the imprudent use of open flame heating equipment (salamanders) near flammable substances. Such use must be carefully monitored by supervision, particularly the location of the equipment vis-a-personnel, stored combustible liquids, packing materials, etc.

No-smoking rules, where posted, shall be observed without fail.

Employees required to use flamecutting, soldering, or welding equipment shall observe all applicable rules for fire protection during such work.

Firefighting equipment and fire exits must be kept clear and ready for immediate use at all times. If a fire extinguisher has been used, replace it with a full and properly sealed extinguisher. Do not place an empty or partially used extinguisher on its bracket, but return it to Central Stores for re-charging.

B. IN THE EVENT OF A FIRE

1. Assure the safety of personnel under your direction.
2. Call for help by contacting the Security Department at 350 or 355 to report the fire, giving the exact location, extent of fire, and your name to the Guard answering the call. He will then do the following:

   a) Page the Fire Brigade
   b) Summon the Sauget Fire Department
   c) Notify Safety and Security Supervisors

3. Assist in extinguishing or containing the fire with fire fighting equipment available in your area (extinguishers, hose drops, etc.) until the Fire Brigade and/or Fire Department arrives.

4. Except in extremely minor situations, do not attempt to fight the fire alone - it may get out of hand and endanger personnel, equipment, buildings, or utilities. CALL FOR HELP FIRST - then do your job in controlling the situation.

   Above all - stay cool.

MIDWEST FIRE PROTECTION COMPANY
9495 PAGE AVENUE
ST. LOUIS, MO 63132

August 20, 1990

Cerro Copper
Attn: Safety Director
P.O. Box 66800
St. Louis, MO 63166-6800

Dear Valued Customer:

Thank you for the opportunity to perform the recent maintenance service of your fire protection equipment. As part of our Service Program, we are sending you the enclosed Fire & Safety Report which lists the locations, sizes, types and conditions of that equipment. Please keep this document with your permanent records, as required by OSHA and the National Fire Codes.

Any recommendations and remarks made by our Service Technicians are intended to make you aware of the actions necessary to further protect your facility and bring you up-to-date with local and state Fire Code requirements. It is our hope that you will seriously consider these recommendations and take the appropriate action to assure the safety of your facility and personnel.

Again, thank you for the opportunity to serve you and your organization. Please call us at (314) 521-0550 whenever we can be of further assistance to you.

Sincerely,

MIDWEST FIRE PROTECTION COMPANY

Tim Gierer
Service Manager

Enclosures

FIRE & SAFETY REPORT

Report Date: 7/90

Prepared For: CERRO COPPER
ATTN: SAFETY DIRECTOR
HIGHWAY #3
SAUGET, IL 62201

	Equipment Location	Size & Type	Last Hydrotest	Last 6Yr Maint	Remarks
1	CENTRAL MAINTENANCE SHOP				
2	BY LOCKERS	20ABC	80	85	MAINTENANCE SERVICE
3	WEST DOOR	20ABC	89		MAINTENANCE SERVICE
4	WEST DOOR	1.5FH	84(90)		HYDROTESTED
5	WEST DOOR	1.5FH	84(90)		HYDROTESTED
6	WEST DOOR	10ABC	89		RECHARGED
7	EAST DOOR	10ABC	85		RECHARGED
8	BY FLOOR LIFT	10ABC	77(90)	83	HYDROTEST/RECHARGED
9	BY FLOOR LIFT	5CO2	87		MAINTENANCE SERVICE
10	ON WELDER	2.5PW	90		MAINTENANCE SERVICE
11	TRACTOR SHOP BUGGIE	10ABC	82	88	MAINTENANCE SERVICE
12	PRESS	20ABC	88		MAINTENANCE SERVICE
13	BY LADDER RACK	10ABC	82	88	MAINTENANCE SERVICE
14	LOCKER ROOM	20ABC	80	86	MAINTENANCE SERVICE
15	STORAGE ROOM	10ABC	85		MAINTENANCE SERVICE
16	RACK 14	10ABC	81	89	MAINTENANCE SERVICE
17	2ND LEVEL BY RACK 2	10ABC	85		MAINTENANCE SERVICE
18	3RD LEVEL BY RACK 11	20ABC	83	89	MAINTENANCE SERVICE
19	3RD LEVEL BY RACK 61	20ABC	79	85	MAINTENANCE SERVICE
20	3RD LEVEL	10ABC	83	(90)	SIX-YEAR MAINTENANCE
21	SAFETY OFFICE COPPIER	20ABC	79	86	MAINTENANCE SERVICE
22	HALL BEHIND SAFETY OFFICE	20ABC	80	86	MAINTENANCE SERVICE
23	PAUL TANDLER'S OFFICE	20ABC	78(90)	84	HYDROTEST/RECHARGED
24	FIRST AID	10ABC	79	88	MAINTENANCE SERVICE
25	LABORATORY	10ABC	89		MAINTENANCE SERVICE
26	LABORATORY	10ABC	89		MAINTENANCE SERVICE
27	LABORATORY	20ABC	88		MAINTENANCE SERVICE
28	LABORATORY	9HALON	86	(90)	SIX-YEAR MAINTENANCE
29	LABORATORY	10ABC	79	87	MAINTENANCE SERVICE
30	OUTSIDE OF PAINT	1.5FH	86		MAINTENANCE SERVICE
31	OUTSIDE OF PAINT	1.5FH	86		MAINTENANCE SERVICE
32	PAINT WAREHOUSE	20ABC	79	85	MAINTENANCE SERVICE
33	PAINT WAREHOUSE	20ABC	83	88	MAINTENANCE SERVICE
34	PAINT SHOP	20ABC	77(90)	82	HYDROTEST/RECHARGED
35	PAINT SHOP	20ABC	81	86	MAINTENANCE SERVICE
36	TOOL MILL SMALL BLOCKS	10ABC	81	87	MAINTENANCE SERVICE
37	TOOL MILL	20ABC	89		MAINTENANCE SERVICE
38	TOOL MILL	20ABC	89		MAINTENANCE SERVICE

Prepared by:
MIDWEST FIRE PROTECTION COMPANY
9495 Page Avenue - St. Louis, MO 63132
(314) 521-0550

FILE WITH PERMANENT RECORDS PER OSHA & NFPA RECORD KEEPING REQUIREMENTS

FIRE & SAFETY REPORT

Report Date: 7/90

Prepared For: CERRO COPPER
ATTN: SAFETY DIRECTOR
HIGHWAY #3
SAUGET, IL 62201

	Equipment Location	Size & Type	Last Hydrotest	Last 6Yr Maint	Remarks
39	TOOL MILL	75CO2	89		WHEELED UNIT
40	TOOL MILL	20ABC	88		MAINTENANCE SERVICE
41	SMALL BLOCKS	10ABC	81	87	MAINTENANCE SERVICE
42	SMALL BLOCKS	1.5FH	80(90)		HYDROTESTED
43	NO. 8TC	20BC	88		MAINTENANCE SERVICE
44	LT #2	20ABC	88		MAINTENANCE SERVICE
45	LEFT BAF #1	20ABC	89		MAINTENANCE SERVICE
46	LEFT BAF	10ABC	82	88	MAINTENANCE SERVICE
47	LEFT BAF POLE 63	20ABC	79	87	MAINTENANCE SERVICE
48	LEFT BAF	20ABC	85		MAINTENANCE SERVICE
49	POLE AC37	10ABC	80	86	MAINTENANCE SERVICE
50	POLE AC37	20ABC	89		MAINTENANCE SERVICE
51	BY 237	150ABC	88		WHEELED UNIT
52	MAINTENANCE SHOP	10ABC	69(90)		HYDROTEST/RECHARGED
53	MAINTENANCE SHOP	20ABC	79	89	MAINTENANCE SERVICE
54	MAINTENANCE BY LOCKERS	10ABC	89		MAINTENANCE SERVICE
55	PAST TUBE MILL OFFICE	10ABC	82	88	MAINTENANCE SERVICE
56	LT#2	20ABC	88		MAINTENANCE SERVICE
57	TUBE MILL	10ABC	88		RECHARGED
58	LEFT OF LT#2	20ABC	89		MAINTENANCE SERVICE
59	LEFT OF WOMENS RESTROOM	20ABC	81	87	MAINTENANCE SERVICE
60	BY ELECTRIC BOX 24	20ABC	77(90)		HYDROTEST/RECHARGED
61	ELECTRIC BOX 24	10ABC	87		MAINTENANCE SERVICE
62	BY EMERGENCY EYEWASH 71	20ABC	89		MAINTENANCE SERVICE
63	BRASS MILL	20ABC	87		MAINTENANCE SERVICE
64	BY DESK	20ABC	82	88	MAINTENANCE SERVICE
65	LEFT OF DESK	10ABC	88		MAINTENANCE SERVICE
66	LEFT OF DESK	20ABC	80	86	MAINTENANCE SERVICE
67	LEFT OF DESK	20ABC	89		MAINTENANCE SERVICE
68	LEFT OF DESK	10ABC	87		MAINTENANCE SERVICE
69	LEFT OF DESK	10ABC	87		MAINTENANCE SERVICE
70	BY POLE AC52	10ABC	89		MAINTENANCE SERVICE
71	BY POLE AC52	1.5FH	83(90)		HYDROTESTED
72	BY POLE AC52	20ABC	90		MAINTENANCE SERVICE
73	BY POLE AA51	20ABC	88		MAINTENANCE SERVICE
74	BY POLE AC60	20ABC	90		MAINTENANCE SERVICE
75	WELDING BOOTH LUNCH ROOM	20ABC	89		MAINTENANCE SERVICE
76	WELDING BOOTH	45ABC	84		WHEELED UNIT

Prepared by:
MIDWEST FIRE PROTECTION COMPANY
9495 Page Avenue - St. Louis, MO 63132
(314) 521-0550

FILE WITH PERMANENT RECORDS PER OSHA & NFPA RECORD KEEPING REQUIREMENTS

F I R E & S A F E T Y R E P O R T

Report Date: 7/90

Prepared For: CERRO COPPER
ATTN: SAFETY DIRECTOR
HIGHWAY #3
SAUGET, IL- 62201

	Equipment Location	Size & Type	Last Hydrotest	Last 6Yr Maint	Remarks
77	BY POLE N58	20ABC	87		MAINTENANCE SERVICE
78	BY POLE N58	1.5FH	85(90)		HYDROTESTED
79	BY POLE W61	20ABC	89		NEEDS TO BE HUNG
80	BY CONTROL PANNEL	20ABC	80	86	MAINTENANCE SERVICE
81	CONTROL PANEL BY POLE N60	20ABC	89		MAINTENANCE SERVICE
82	BY TIME CLOCK	20ABC	83	89	MAINTENANCE SERVICE
83	BY GENERATORS	20ABC	81	87	MAINTENANCE SERVICE
84	BY GENERATORS	20ABC	79	85	MAINTENANCE SERVICE
85	BY POLE J65	50BC	90		WHEELED UNIT
86	BY POLE J65	20ABC	87		MAINTENANCE SERVICE
87	BY POLE J65	20ABC	84	90	MAINTENANCE SERVICE
88	BY ELECTRIC PANEL	20ABC	89		NEEDS TO BE HUNG
89	BY NORTH OVERHEAD DOOR	20ABC	88		MAINTENANCE SERVICE
90	MACHINE SHOP	10ABC8	0	88	MAINTENANCE SERVICE
91	BY OFFICE	10ABC	89		MAINTENANCE SERVICE
92	BY CAGE	10ABC	89		RECHARGED
93	CONTROL PANEL	10ABC	86		MAINTENANCE SERVICE
94	ON CAGE	10ABC	89		MAINTENANCE SERVICE
95	BY SMALL DRILL PRESS	10ABC	(90)	84	HYDROTEST/RECHARGED
96	LUNCH ROOM	10ABC8	7		MAINTENANCE SERVICE
97	POLE C44	10ABC	88		MAINTENANCE SERVICE
98	POLE G58	10ABC	81	87	MAINTENANCE SERVICE
99	POLE G54	10ABC	82	88	MAINTENANCE SERVICE
100	PUMP ROOM	20ABC	89		MAINTENANCE SERVICE
101	BY POLE G34	20ABC	89		MAINTENANCE SERVICE
102	BY POLE F31	10ABC	79	89	MAINTENANCE SERVICE
103	BY POLE F31	20ABC	85		MAINTENANCE SERVICE
104	BY POLE 27	10ABC	87		MAINTENANCE SERVICE
105	BY POLE 27	20C02	85(90)		HYDROTEST/RECHARGED
106	24 BLOCK	10ABC	89		RECHARGED
107	24 BLOCK	20ABC	88		RECHARGED
108	24 BLOCK	10ABC	88		MAINTENANCE SERVICE
109	POLE AE31	10ABC	82	88	MAINTENANCE SERVICE
110	ELECTRIC BOX 6	20ABC	82	89	RECHARGED
111	ELECTRIC BREAKER BOXES	20ABC	89		RECHARGED
112	~~BREAKER BOXES~~	~~20ABC~~	~~82~~	~~88~~	~~MAINTENANCE SERVICE~~
113	BLOCK 6 UPSTAIRS	10ABC	(90)		HYDROTEST/RECHARGED
114	BLOCK 6 UPSTAIRS	10ABC	80	86	MAINTENANCE SERVICE

Prepared by:
MIDWEST FIRE PROTECTION COMPANY
9495 Page Avenue - St. Louis, MO 63132
(314) 521-0550

FILE WITH PERMANENT RECORDS PER OSHA & NFPA RECORD KEEPING REQUIREMENTS

AU3P • 11 1/90

F I R E & S A F E T Y R E P O R T

Report Date: 7/90

Prepared For: CERRO COPPER
ATTN: SAFETY DIRECTOR
HIGHWAY #3
SAUGET, IL 62201

	Equipment Location	Size & Type	Last Hydrotest	Last 6Yr Maint	Remarks
115	BLOCK #6	1.5FH	85(90)		HYDROTESTED
116	BLOCK #5	10ABC	89		MAINTENANCE SERVICE
117	BLOCK #5 UPSTAIRS	10ABC	78(90)		HYDROTEST/RECHARGED
118	BLOCK #5 UPSTAIRS	10ABC	80	87	MAINTENANCE SERVICE
119	POLE Z31	1.5FH	84(90)		HYDROTESTED
120	POLE Z26	1.5FH	85(90)		HYDROTESTED
121	#4 BLOCK UPSTAIRS	20ABC	77(90)		HYDROTEST/RECHARGED
122	#4 BLOCK	20ABC	88		MAINTENANCE SERVICE
123	MAINTENANCE SHOP BY VISE	10ABC	81	88	RECHARGED
124	MACHINE SHOP 007	10ABC	79	85	MAINTENANCE SERVICE
125	OUTSIDE MACHINE SHOP 007	1.5FH	85(90)		HYDROTESTED
126	OUTSIDE MACHINE SHP	10ABC	88		RECHARGED
127	OUTSIDE MACHINE SHOP	50C02	90		MAINTENANCE SERVICE
128	#3 BLOCK	150BC	83		WHEELED UNIT
129	#3 BLOCK	110NITRO	88		WHEELED UNIT
130	#3 BLOCK UPSTAIRS	10ABC	79	85	MAINTENANCE SERVICE
131	#3 BLOCK UPSTAIRS	10ABC	88		MAINTENANCE SERVICE
132	#7 BLOCK	20ABC	83	89	MAINTENANCE SERVICE
133	#7 BLOCK	20ABC	88		MAINTENANCE SERVICE
134	#8 BLOCK	10ABC	85		MAINTENANCE SERVICE
135	#8 BLOCK	20ABC	89		MAINTENANCE SERVICE
136	#8 BLOCK	20C02	85(90)		HYDROTEST/RECHARGED
137	POLE 020	20ABC	89		MAINTENANCE SERVICE
138	POLE AD20	10ABC	88		MAINTENANCE SERVICE
139	POLE AE20	20ABC	82	89	MAINTENANCE SERVICE
140	POLE AE20	20ABC	89		MAINTENANCE SERVICE
141	POLE AE16	10ABC	87		MAINTENANCE SERVICE
142	ACROSS FROM POLE AD5	20ABC	89		RECHARGED
143	POLE W16	1.5FH	85(90)		HYDROTESTED
144	POLE Y16	20ABC	88		MAINTENANCE SERVICE
145	POLE 010	10ABC	89		RECHARGED
146	POLE K7	1.5FH	85(90)		HYDROTESTED
147	LT. 1 POLE K14	20ABC	87		RECHARGED
148	POLE AN16	10ABC	83	89	MAINTENANCE SERVICE
149	POLE AL16	10ABC	82	88	MAINTENANCE SERVICE
150	POLE AX18	20ABC	88		MAINTENANCE SERVICE
151	POLE AT20	20ABC	(90)		HYDROTEST/RECHARGED
152	POLE AT20	1.5FH	83(90)		HYDROTESTED

Prepared by:
MIDWEST FIRE PROTECTION COMPANY
9495 Page Avenue - St. Louis, MO 63132
(314) 521-0550

FILE WITH PERMANENT RECORDS PER OSHA & NFPA RECORD KEEPING REQUIREMENTS

F I R E & S A F E T Y R E P O R T

Report Date: 7/90

Prepared For: CERRO COPPER
ATTN: SAFETY DIRECTOR
HIGHWAY #3
SAUGET, IL 62201

	Equipment Location	Size & Type	Last Hydrotest	Last 6Yr Maint	Remarks
153	POLE AV23	200ABC	88		MAINTENANCE SERVICE
154	POLE AV23	10ABC	87		MAINTENANCE SERVICE
155	POLE AV23	20ABC	83	89	MAINTENANCE SERVICE
156	BY SCALE	20ABC	82	88	MAINTENANCE SERVICE
157	OUTSIDE BY TANK	10ABC	77(90)		HYDROTEST/RECHARGED
158	DOCK	20ABC	(90)		HYDROTEST/RECHARGED
159	DOCK BREAKER BOXES	20ABC	88		MAINTENANCE SERVICE
160	SHIPPING OFFICE	20ABC	88		NEEDS TO BE HUNG
161	POLE S2	20ABC	88		MAINTENANCE SERVICE
162	RAMP LOW LEVEL WAREHOUSE	20ABC	88		MAINTENANCE SERVICE
163	OVERHEAD DOOR	10ABC	82	88	MAINTENANCE SERVICE
164	POLE LINE SETS	10ABC	88		MAINTENANCE SERVICE
165	EXIT DOOR	20ABC	80	86	MAINTENANCE SERVICE
166	EXIT DOOR	20ABC	80	86	MAINTENANCE SERVICE
167	REFACTORY	20ABC	79	87	MAINTENANCE SERVICE
168	FLAT SHOP	20ABC	(90)	83	HYDROTEST/RECHARGED
169	FLAT SHOP	20ABC	80	86	MAINTENANCE SERVICE
170	FLAT SHIP	10ABC	89		MAINTENANCE SERVICE
171	FIRE BOX	10ABC	82	(90)	SIX-YEAR MAINTENANCE
172	FIRE BOX	10BAC	79	85	MAINTENANCE SERVICE
173	FIRE BOX	10ABC	78(90)	84	HYDROTEST/RECHARGED
174	FIRE BOX	10ABC	78(90)	84	HYDROTEST/RECHARGED
175	FIRE BOX	10ABC	80	88	MAINTENANCE SERVICE
176	FIRE BOX	10ABC	88		MAINTENANCE SERVICE
177	FIRE BOX	1.5FH	84(90)		HYDROTESTED
178	FIRE BOX	1.5FH	76(90)		HYDROTESTED
179	FIRE BOX	1.5FH	78(90)		HYDROTESTED
180	FIRE BOX	1.5FH	83(90)		HYDROTESTED
181	FIRE BOX	1.5FH	83(90)		HYDROTESTED
182	NO. 1 FEEDER	1.5FH	86		MAINTENANCE SERVICE
183	FOUNDRY MAINT. SHOP	20ABC	87		MAINTENANCE SERVICE
184	FOUNDRY MAINT. SHOP	20ABC	87		MAINTENANCE SERVICE
185	PUMP SHED	20ABC	89		MAINTENANCE SERVICE
186	ELECTRIC SHED	20ABC	89		MAINTENANCE SERVICE
187	ELECTRIC SHED	20ABC	90		MAINTENANCE SERVICE
188	ELECTRIC SHED	20ABC	88		MAINTENANCE SERVICE
189	BEHIND SHED	1.5FH	87		NEEDS NEW REEL
190	OLD FOUNDRY	10ABC	88		RECHARGED

Prepared by:
MIDWEST FIRE PROTECTION COMPANY
9495 Page Avenue - St. Louis, MO 63132
(314) 521-0550

FILE WITH PERMANENT RECORDS PER OSHA & NFPA RECORD KEEPING REQUIREMENTS

FIRE & SAFETY REPORT

Report Date: 7/90

Prepared For: CERRO COPPER
ATTN: SAFETY DIRECTOR
HIGHWAY #3
SAUGET, IL 62201

	Equipment Location	Size & Type	Last Hydrotest	Last 6Yr Maint	Remarks
191	BY BOILER	10ABC	82	89	MAINTENANCE SERVICE
192	BY BOILER	10ABC	80	86	MAINTENANCE SERVICE
193	COMPRESSOR ROOM	20ABC	89		MAINTENANCE SERVICE
194	MIDDLE POLE COMPRESSOR RM.	10ABC	80	86	MAINTENANCE SERVICE
195	TANK HOUSE	20ABC	89		MAINTENANCE SERVICE
196	TANK HOUSE	10ABC	90		MAINTENANCE SERVICE
197	TANK HOUSE	10ABC	88		MAINTENANCE SERVICE
198	BY DESK	20ABC	85		MAINTENANCE SERVICE
199	TANK HOUSE TANK 02	20ABC	81	87	MAINTENANCE SERVICE
200	TANK HOUSE	20ABC	88		MAINTENANCE SERVICE
201	BY TANK 18	20ABC	89		MAINTENANCE SERVICE
202	LOCKER ROOM	20ABC	83	89	MAINTENANCE SERVICE
203	TANK ROOM OFFICE	13HALON	88		MAINTENANCE SERVICE
204	OUTSIDE BREAKER ROOM	20ABC	90		MAINTENANCE SERVICE
205	INSIDE BREAKER ROOM	13HALON	88		MAINTENANCE SERVICE
206	POLE D4	20ABC	77(90)	84	HYDROTEST/RECHARGED
207	POLE D2	20ABC	88		MAINTENANCE SERVICE
208	POLE E9	20ABC	78(90)		HYDROTEST/RECHARGED
209	SX FRONT DOOR	20ABC	87		MAINTENANCE SERVICE
210	SX	20ABC	82	88	MAINTENANCE SERVICE
211	SX ON CATWALK	20ABC	81	87	MAINTENANCE SERVICE
212	CATWALK STAIRS	10ABC	79	88	MAINTENANCE SERVICE
213	ON CATWALK	20ABC	82	88	MAINTENANCE SERVICE
214	SX	125BC	89		WHEELED UNIT
215	OVERHEAD DOOR SX	20ABC	89		MAINTENANCE SERVICE
216	OVERHEAD DOOR SX	20ABC	81	87	MAINTENANCE SERVICE
217	OVERHEAD DOOR SX	20ABC	81	87	MAINTENANCE SERVICE
218	2 WEST DOOR	20ABC	84	90	MAINTENANCE SERVICE
219	SX	20ABC	79	87	MAINTENANCE SERVICE
220	IN CAGE	20ABC	89		MAINTENANCE SERVICE
221	FOUNDRY N.O. FIRE BOX	20ABC	85		MAINTENANCE SERVICE
222	FIRE BOX E6	1.5FH	86		MAINTENANCE SERVICE
223	OVERHEAD CRANE	10ABC	88		MAINTENANCE SERVICE
224	OVERHEAD CRANE	20ABC	86		MAINTENANCE SERVICE
225	OVERHEAD CRANE	1.5FH	85(90)		HYDROTESTED
226	BIG SOUTH DOCK	20ABC	90		MAINTENANCE SERVICE
227	WEST WALL	10ABC	89		MAINTENANCE SERVICE
228	FOUNDRY ELEC. ROOM	10BC	89		MAINTENANCE SERVICE

Prepared by:
MIDWEST FIRE PROTECTION COMPANY
9495 Page Avenue - St. Louis, MO 63132
(314) 521-0550

FILE WITH PERMANENT RECORDS PER OSHA & NFPA RECORD KEEPING REQUIREMENTS

FIRE & SAFETY REPORT

Report Date: 7/90

Prepared For: CERRO COPPER
ATTN: SAFETY DIRECTOR
HIGHWAY #3
SAUGET, IL 62201

	Equipment Location	Size & Type	Last Hydrotest	Last 6Yr Maint	Remarks
229	FOUNDRY ELEC. ROOM	10ABC	88		MAINTENANCE SERVICE
230	2ND LEVEL FOUNDRY	20ABC	81	85	MAINTENANCE SERVICE
231	2ND LEVEL FOUNDRY ON STAIRS	10ABC	88		MAINTENANCE SERVICE
232	BY BOILERS	20ABC	83	89	MAINTENANCE SERVICE
233	DOCK LOWLING OFFICE	10ABC	80	86	MAINTENANCE SERVICE
234	BY BIN 27	20ABC	88		MAINTENANCE SERVICE
235	BY BIN 27	10ABC	81	87	MAINTENANCE SERVICE
236	HYDRALIC SHOP	5CO2	88		MAINTENANCE SERVICE
237	OUTSIDE SHOP	10ABC	87		MAINTENANCE SERVICE
238	OUTSIDE SHOP	20ABC	82	(90)	SIX-YEAR MAINTENANCE
239	LOW LYING DOCK EAST	10ABC	80	87	MAINTENANCE SERVICE
240	LOW LYING DOCK EAST	10ABC	78(90)		HYDROTEST/RECHARGED
241	LOW LYING DOCK EAST	20ABC	89		RECHARGED
242	3RD LEVEL CONCRETE BLDG.	20ABC	89		MAINTENANCE SERVICE
243	3RD LEVEL CONCRETE BLDG.	20ABC	83	89	MAINTENANCE SERVICE
244	2ND LEVEL CONCRETE BLDG.	20ABC	79	83	MAINTENANCE SERVICE
245	2ND LEVEL CONCRETE BLDG.	20ABC	79	85	MAINTENANCE SERVICE
246	2ND LEVEL CONCRETE BLDG.	20ABC	77(90)	82	HYDROTEST/RECHARGED
247	2ND LEVEL EAST WALL	20ABC	86		MAINTENANCE SERVICE
248	2ND LEVEL EAST WALL	10ABC	80	86	MAINTENANCE SERVICE
249	RAILROAD DOCK	20ABC	82	88	MAINTENANCE SERVICE
250	RAILROAD DOCK	20ABC	83	89	MAINTENANCE SERVICE
251	RAILROAD DOCK	1.5FH			CANNOT REACH
252	PUMP HOUSE	20ABC	88		MAINTENANCE SERVICE
253	PUMP HOUSE	1.5FH	77(90)		HYDROTESTED
254	PUMP HOUSE	1.5FH	78(90)		HYDROTESTED
255	CARTON BLDG.	20ABC	86	(90)	SIX-YEAR MAINTENANCE
256	CARTON BLDG.	10ABC	79	85	MAINTENANCE SERVICE
257	CARTON BLDG.	10ABC	79	85	MAINTENANCE SERVICE
258	CARTON BLDG. BY FIRE EXIT	20ABC	90		MAINTENANCE SERVICE
259	CARTON BLDG. BY FIRE EXIT	20ABC	80	86	MAINTENANCE SERVICE
260	2ND CARTON BLDG.	10ABC	87		MAINTENANCE SERVICE
261	2ND FL. CARTON BLDG.	20ABC	90		MAINTENANCE SERVICE
262	1ST FL. SALES OFFICE	10ABCB	9		MAINTENANCE SERVICE
263	NORTH WALL	10ABCB	7		MAINTENANCE SERVICE
264	2ND FL. SALES OFFICE	10ABC	80	86	MAINTENANCE SERVICE
265	2ND FL. IN CLOSET	10ABC	89		MAINTENANCE SERVICE
266	2ND FL. IN CLOSET	20ABC	89		MAINTENANCE SERVICE

Prepared by:
MIDWEST FIRE PROTECTION COMPANY
9495 Page Avenue - St. Louis, MO 63132
(314) 521-0550

AU3P • 11 1/90 FILE WITH PERMANENT RECORDS PER OSHA & NFPA RECORD KEEPING REQUIREMENTS

VI-1-11

FIRE & SAFETY REPORT

Report Date: 7/90

Prepared For: CERRO COPPER
ATTN: SAFETY DIRECTOR
HIGHWAY #3
SAUGET, IL 62201

	Equipment Location	Size & Type	Last Hydrotest	Last 6Yr Maint	Remarks
267	BASEMENT SALES OFFICE	10ABC	89		MAINTENANCE SERVICE
268	GARAGE IN SALES OFFICE	1.5FH	80(90)		HYDROTESTED
269	BRICK BLDG. ACROSS SALES	10ABC	88		MAINTENANCE SERVICE
270	ACROSS FROM SALES	10ABC	80	87	MAINTENANCE SERVICE
271	LUNCH ROOM	20ABC	82	88	MAINTENANCE SERVICE
272	LUNCH ROOM	10ABC	81	87	MAINTENANCE SERVICE
273	GUARD HOUSE	20ABC	81	87	MAINTENANCE SERVICE
274	FURANCE ROOM	10ABC	80	87	MAINTENANCE SERVICE
275	FURNACE ROOM	10ABC	79	85	MAINTENANCE SERVICE
276	EAST HALL	10ABC	88		MAINTENANCE SERVICE
277	LUNCH ROOM	13HALON	83	(90)	SIX-YEAR MAINTENANCE
278	SECURITY PICK UP	10ABC	89		MAINTENANCE SERVICE
279	SECURITY PICK UP	10ABC	90		MAINTENANCE SERVICE
280	BLDG. 80				
281	#3 TANDEM	10ABC	89		NEEDS TO BE HUNG
282	POLE K10	1.5FH	84(90)		HYDROTESTED
283	POLE K12-K13	20ABC	90		MAINTENANCE SERVICE
284	POLE K12-K13	10ABC	90		MAINTENANCE SERVICE
285	POLE K12-K13	20ABC	79	85	MAINTENANCE SERVICE
286	POLE K12-K13	20ABC	88		MAINTENANCE SERVICE
287	POLE K18	10ABC	87		MAINTENANCE SERVICE
288	POLE K19	20ABC	82	88	MAINTENANCE SERVICE
289	POLE K19	20ABC	79	85	MAINTENANCE SERVICE
290	POLE K19	20ABC	89		MAINTENANCE SERVICE
291	POLE K19	20ABC	81	87	MAINTENANCE SERVICE
292	POLE K19	20ABC	79	87	MAINTENANCE SERVICE
293	POLE K20	1.5FH	78(90)		HYDROTESTED
294	POLE K20	10ABC	82	88	MAINTENANCE SERVICE
295	COMPRESSOR ROOM	20ABC	79	85	MAINTENANCE SERVICE
296	COMPRESSOR ROOM	10ABC	88		MAINTENANCE SERVICE
297	POLE H21	10ABC	83	89	MAINTENANCE SERVICE
298	BIG BREAKER BOX	10ABC	(90)	86	HYDROTEST/RECHARGED
299	SOUTHEAST DOOR	20ABC	81	86	MAINTENANCE SERVICE
300	POLE D14	1.5FH	87		MAINTENANCE SERVICE
301	POLE H14	10ABC	82	89	MAINTENANCE SERVICE
302	POLE H14	20ABC	78(90)		HYDROTEST/RECHARGED
303	POLE H14	1.5FH	88		MAINTENANCE SERVICE
304	POLE H5	20ABC	81	87	MAINTENANCE SERVICE

Prepared by:
MIDWEST FIRE PROTECTION COMPANY
9495 Page Avenue - St. Louis, MO 63132
(314) 521-0550

FILE WITH PERMANENT RECORDS PER OSHA & NFPA RECORD KEEPING REQUIREMENTS

AU3P • 11 1/90

FIRE & SAFETY REPORT

Report Date: 7/90

Prepared For: CERRO COPPER
ATTN: SAFETY DIRECTOR
HIGHWAY #3
SAUGET, IL 62201

	Equipment Location	Size & Type	Last Hydrotest	Last 6Yr Maint	Remarks
305	POLE H5	1.5FH	84(90)		HYDROTESTED
306	STATION 78	5C02	87		MAINTENANCE SERVICE
307	STATION 78	20ABC	87		MAINTENANCE SERVICE
308	STATION 75	20ABC	81	87	MAINTENANCE SERVICE
309	STATION 75	20ABC	88		RECHARGED
310	LEFT OF D4	150BC	89		WHEELED UNIT
311	LEFT OF D4	110NITRO	87		WHEELED UNIT
312	POLE A11	20ABC	82	88	MAINTENANCE SERVICE
313	POLE D9	125BC	90		MAINTENANCE SERVICE
314	POLE D9	20ABC	82	88	MAINTENANCE SERVICE
315	STATION 19	20ABC	90		MAINTENANCE SERVICE
316	STATION 44	1.5FH	85(90)		HYDROTESTED
317	STATION 50	20ABC	90		MAINTENANCE SERVICE
318	POLE I8	20ABC	90		MAINTENANCE SERVICE
319	BRIDGE STATION 8	20ABC	85		MAINTENANCE SERVICE
320	HAMMER MILL	20ABC	82	88	MAINTENANCE SERVICE
321	HAMMER MILL	20ABC	82	88	MAINTENANCE SERVICE
322	L.P. SHED	20ABC	88		MAINTENANCE SERVICE
323	L.P. SHED	10ABC	88		MAINTENANCE SERVICE
324	L.P. SHED	125BC	89		WHEELED UNIT
325	L.P. SHED	20ABC	79	88	MAINTENANCE SERVICE
326	L.P. SHED	1.5FH	86		MAINTENANCE SERVICE
327	2ND LEVEL	10ABC	79	85	MAINTENANCE SERVICE
328	SHOP BY BENCH	20ABC	87		MAINTENANCE SERVICE
329	SHOP BY BENCH	10ABC	79	89	MAINTENANCE SERVICE
330	SHOP BY BENCH	10ABC	80	86	MAINTENANCE SERVICE
331	BY NORTHEAST DOOR	20ABC	85		MAINTENANCE SERVICE
332	OFFICE	10ABC	79	89	MAINTENANCE SERVICE
333	OFFICE	10ABC	88		MAINTENANCE SERVICE
334	COMPRESSOR	10ABC	82	88	MAINTENANCE SERVICE
335	OUTSIDE COMPRESSOR	20ABC	88		MAINTENANCE SERVICE
336	OUTSIDE COMPRESSOR	20ABC	85		MAINTENANCE SERVICE
337	OUTSIDE COMPRESSOR	10ABC	79	85	MAINTENANCE SERVICE
338	OUTSIDE COMPRESSOR	20ABC	90		MAINTENANCE SERVICE
339	OUTSIDE COMPRESSOR	20ABC	87		MAINTENANCE SERVICE
340	OUTSIDE COMPRESSOR	10ABC	85		MAINTENANCE SERVICE
341	OUTSIDE COMPRESSOR	20ABC	88		MAINTENANCE SERVICE
342	OUTSIDE COMPRESSOR	10BC	88		MAINTENANCE SERVICE

Prepared by:
MIDWEST FIRE PROTECTION COMPANY
9495 Page Avenue - St. Louis, MO 63132
(314) 521-0550

FILE WITH PERMANENT RECORDS PER OSHA & NFPA RECORD KEEPING REQUIREMENTS

FIRE & SAFETY REPORT

Report Date: 7/90

Prepared For: CERRO COPPER
ATTN: SAFETY DIRECTOR
HIGHWAY #3
SAUGET, IL 62201

	Equipment Location	Size & Type	Last Hydrotest	Last 6Yr Maint	Remarks
343	OUTSIDE COMPRESSOR	125BC	81	87	WHEELED UNIT
344	POLE BL	1.5FH	86		MAINTENANCE SERVICE
345	SOUTH DOOR	20ABC	88		MAINTENANCE SERVICE
346	SOUTH DOOR	2ABC	88		MAINTENANCE SERVICE
347	SOUTH DOOR	20ABC	83	90	MAINTENANCE SERVICE
348	SOUTH DOOR	20ABC	79	85	MAINTENANCE SERVICE
349	HOT WELL NO. 6	20ABC	83	88	MAINTENANCE SERVICE
350	HOT WELL NO. 6	10ABC	80	86	MAINTENANCE SERVICE
351	IN PIT	20ABC	88		MAINTENANCE SERVICE
352	2ND LEVEL	10ABC	81	87	MAINTENANCE SERVICE
353	2ND LEVEL	20ABC	81	87	MAINTENANCE SERVICE
354	SOUTHEAST BIG DOOR	20ABC	(90)		HYDROTEST/RECHARGED
355	OXYGEN PUMP ROOM	10ABC	90		MAINTENANCE SERVICE
356	NEW BLDG.	20ABC	89		MAINTENANCE SERVICE
357	NEW BLDG.	1.5FH	88		MAINTENANCE SERVICE
358	NEW BLDG. BY TOOL ROOM	1.5FH			MAINTENANCE SERVICE
359	TRAIN DOCK	20ABC	79	85	MAINTENANCE SERVICE
360	TRAIN DOCK	20ABC	90		MAINTENANCE SERVICE
361	TRAIN DOCK	20ABC	89		MAINTENANCE SERVICE
362	TRAIN DOCK	20ABC	88		MAINTENANCE SERVICE
363	TRAIN DOCK	20ABC	88		MAINTENANCE SERVICE
364	UNDER STAIRS	1.5FH	89		MAINTENANCE SERVICE
365	UNDER STAIRS	20ABC	88		MAINTENANCE SERVICE
366	RAILROAD SCALE	20ABC	88		MAINTENANCE SERVICE
367	RAILROAD SCALE	20ABC	89		MAINTENANCE SERVICE
368	2ND FL. OFFICE	10ABC	82	(90)	SIX-YEAR MAINTENANCE
369	DOCK	20ABC	90		MAINTENANCE SERVICE
370	DOCK	1.5FH	89		MAINTENANCE SERVICE
371	BY TOOL LOCKER	20ABC	90		MAINTENANCE SERVICE
372	BY TOOL LOCKER	20ABC	78(90)		HYDROTEST/RECHARGED
373	BY TOOL LOCKER	10ABC	87		MAINTENANCE SERVICE
374	BY TOOL LOCKER	20ABC	79	86	MAINTENANCE SERVICE
375	BY COPPER PIT	20ABC	88		MAINTENANCE SERVICE
376	BY COPPER PIT	1.5FH	84(90)		HYDROTESTED
377	BY COPPER PIT	1.5FH	84(90)		HYDROTESTED
378	UNDER CRANE STEPS	20ABC	88		RECHARGED
379	UNDER CRANE STEPS	10ABC	90		RECHARGED
380	UNDER CRANE STEPS	10ABC	82	88	RECHARGED

Prepared by:
MIDWEST FIRE PROTECTION COMPANY
9495 Page Avenue - St. Louis, MO 63132
(314) 521-0550

KL-1-15

F I R E & S A F E T Y R E P O R T

Report Date: 7/90

Prepared For: CERRO COPPER
ATTN: SAFETY DIRECTOR
HIGHWAY #3
SAUGET, IL 62201

	Equipment Location	Size & Type	Last Hydrotest	Last 6Yr Maint	Remarks
-19	SPARE	20ABC	90		MAINTENANCE SERVICE
-20	SPARE	10ABC	79	90	MAINTENANCE SERVICE
-21	SPARE	10ABC	(90)	83	HYDROTEST/RECHARGED
-22	SPARE	10ABC	80	86	MAINTENANCE SERVICE
-23	SPARE	10ABC	89		RECHARGED
-24	SPARE	20ABC	90		RECHARGED
-25	SPARE	20ABC	82	88	MAINTENANCE SERVICE
-26	SPARE	20ABC	88		MAINTENANCE SERVICE
-27	SPOT TRUCK #105	2.5BC	89		MAINTENANCE SERVICE
-28					
-29					
-30					
-31					
-32					

Prepared by:
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(314) 521-0550

FILE WITH PERMANENT RECORDS PER OSHA & NFPA RECORD KEEPING REQUIREMENTS

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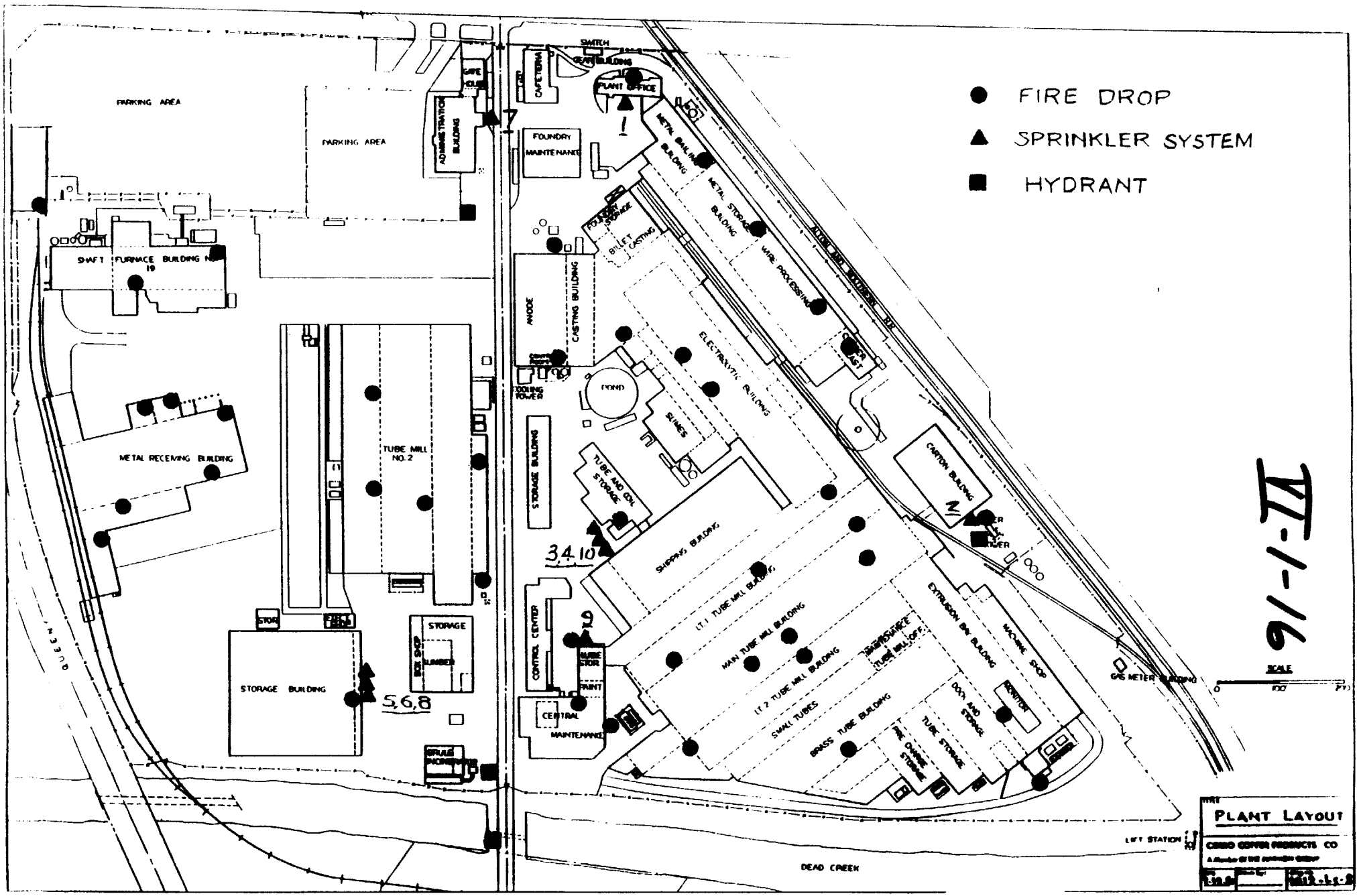
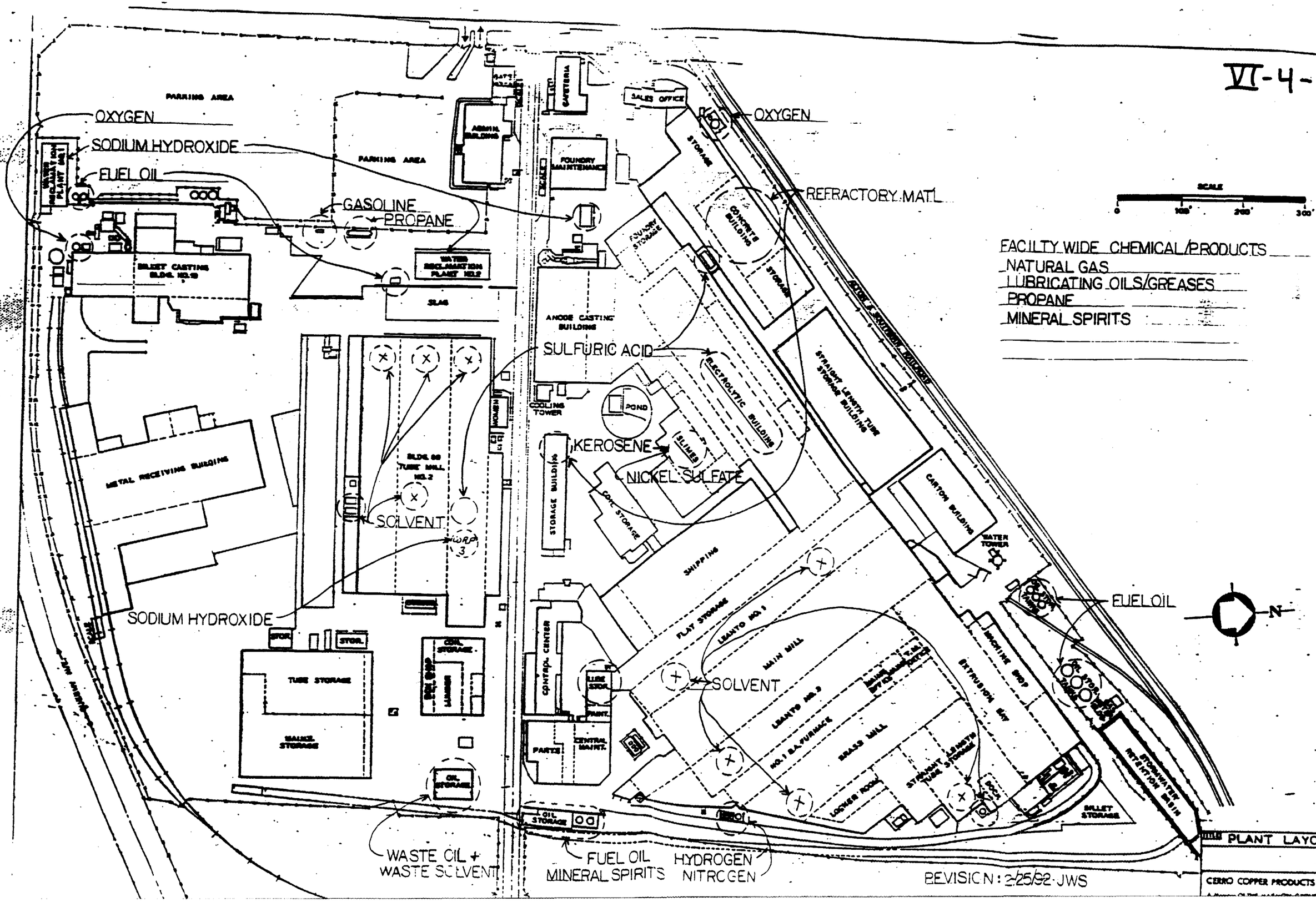


II-A-1-16

FIRE WATER LOCATIONS

10/23/02



SCALE
0 100' 200' 300'

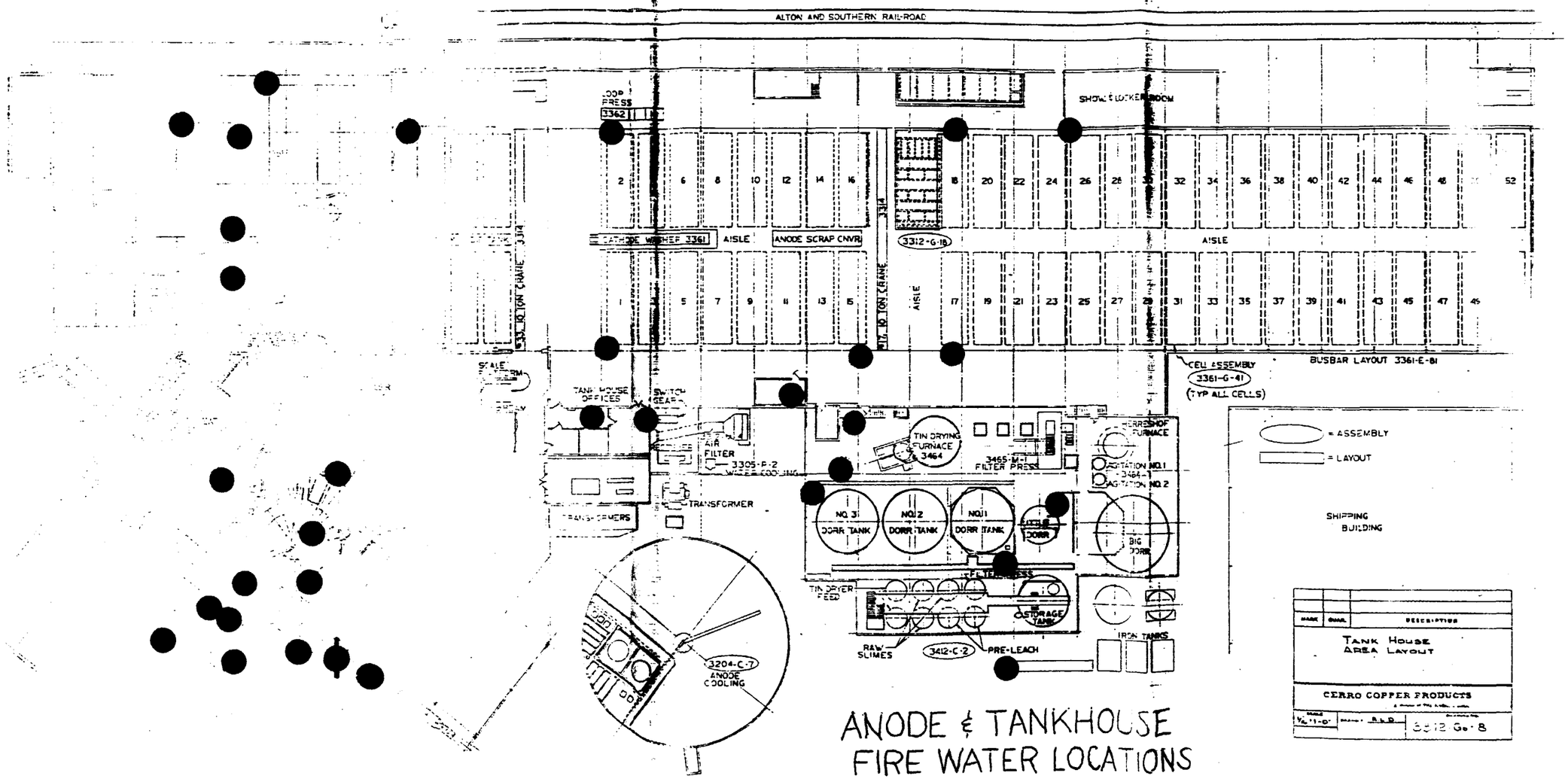
FACILITY WIDE CHEMICAL/PRODUCTS
NATURAL GAS
LUBRICATING OILS/GREASES
PROPANE
MINERAL SPIRITS

REVISION: 2/25/92 JWS

PLANT LAYOUT

CERRO COPPER PRODUCTS CO.

VI-1-20



ANODE & TANKHOUSE FIRE WATER LOCATIONS

FIRE HOSE (1)

EXTINGUISHER (32)

II-1-19

Wheel Unit

BUILDING 80
RE WATER LOCATIONS

EXTINGUISHER

FIRE HOSE

FE-1-18

ASARCO COOLING TOWER

4822-C-2 RECYCLE TANK

4822-C-1

4822-S-5

OXYGEN TANK

MIST ELIMINATOR

4822-G-1

MOTOR CONTROL

CONTROL ROOM

MOTOR PLATFORM

4822-M-15 SLAG HAMBER

MAERZ FURNACE 4820-M-65

SECOND FLOOR

ASARCO FURNACE 4720

SKIP HOIST 4716-M-13

SKIP HOIST FLOOR OPENING

MAERZ POLING HOIST

REST ROOM

FIELD LAB

DRYING ROOM 4712-S-1

4720-M-76

10 TON CRANE 4714 66'9

4720-M-78

4705-E-101 COMPRESSOR

SLAG FURNACE 4720-M-86

4720-M-60

HOLDING FURNACE 4720-M-85

CASTING MACH.

CASTING MACH. HOT WEL

CONTROL BOOTH

HYD. UNIT

20'-0" (TYP)

4704-G-13 MAERZ COOLING TOWER

4705-G-30

SWITCH GEAR ROOM - 2nd FLOOR OBSOLETE REFER TO 4705-G-14

4712-C

COOLING TOW

MAINTENANCE ROOM

4741-M-65

LOG TACKER 41-M-22

HYD UNIT

SAW 4741

4741-M-114

SAW CONTROLS

INSP. STATION 4741-M-115

4741-M-119

BIL HAN

STORAGE

LOBBY

BATH

STORAGE

OFFICE

OFFICE

LOBBY

OFFICE

OFFICE

LOCKER ROOM

BUILDING 19
FIRE WATER LOCATIONS

of the

CRITICALLY ILL OR INJURED EMPLOYEE

1. Remove the victim from the immediate area if needed to prevent additional injury, without jeopardizing the safety of others. If the victim has fallen and has a possible back or neck injury do not move him unless it is a life threatening situation. Have someone call for help immediately.

2. CALL FOR HELP! During the day shift dial extension 210 and notify the plant nurse and Safety Department of an accident. If there is no answer after 3 rings, call Security at 350 and request an ambulance. On second and third shift call extension 350 and request an ambulance to your location.

3. If the victim stops breathing, check the area quickly for electrical wires before touching him. If live electrical wires are present carefully remove them from the area using a wooden stick. After removing the victim to a safe area initiate CPR if needed. If you do not know CPR call for help. If bleeding is noted apply direct pressure to the wound. Lay the victim down if standing or sitting and cover with a blanket to decrease the chances of shock.

4. When requesting medical assistance from the Dispensary, or an ambulance, state the location, person or persons injured and types of injuries, if known.

5. Clear the area as much as possible to help get the stretcher from the ambulance to the victim.

6. Notify Mr. Tandler and Mr. Conreaux of the accident.

7. Initiate an accident investigation. Interview everyone involved while it is still fresh in their mind. Document all information accurately.

8. Send an Accident Report to the Safety Department as soon as possible that day to ensure proper followup of the incident.

CHEMICAL SPILLS

GUIDELINES FOR MAINTENANCE & OPERATING SUPERVISORS

FEBRUARY 1991

These guidelines cover chemical spill incidents occurring on the ground and into the sewer system. These guidelines are not meant to cover every situation, but will provide the supervisor aid in determining the right course of action. When a spill occurs remember three guidelines:

"CONTAIN" the spill.

"CLEAN-UP" the spill.

"REPORT" the spill.

No matter how the spill occurs or the circumstances surrounding the spill the supervisor can never go wrong or get into trouble if he follows the directions above.

I. CONTAIN & CLEAN-UP

If a spill occurs to the ground or pavement, every attempt should be made to dike the spill. Additionally, the safety of the employee is of the highest concern and when cleaning up spills the employee must be properly protected with gloves, glasses or goggles, boots, coveralls and/or a respirator if needed. The Storeroom maintains the appropriate safety gear to be used in a clean-up.

a) For spills of oils and solvents use oil absorbent material for diking and clean-up. After the spill has been contained sweep up the absorbent material and place it in a barrel or container.

b) For acidic materials spills, use a powdered neutralizing material such as soda ash, bag lime or calcium carbonate for diking and clean-up. Once an acid spill is neutralized it can be hosed down to the sewer with water, or if it's tankhouse solution it can be picked up and placed in barrels for possible recovery. Acidic solution spills inside the tankhouse can be hosed to the containment area for recovery.

c) Spills of caustic type material can be hosed to the sewer with a large amount of water.

d) Spills of sludge, dusts and other solid material should always be swept up into a container.

e) If you are not sure how to clean-up the spilled material, or don't know the material contents, look at the MSDS.

f) When a spill is to a sewer, always flush with a large amount of water.

g) Always mark or label a container where you have put the cleaned up materia

II. REPORTING (Spills to the ground or to the sewer.)

Always report a spill on the ground outside of a building or to the sewer inside or outside of a building to the senior supervisor. Spills inside of buildings are not included if they do not go to the sewer. The outside ground is soil, pavement and concrete outside of the building.

For small spills, less than 55 gallons of a liquid or 100 pounds of a solid, the senior supervisor should call Environmental Affairs at Extension 297 and report the date and time of the spill, the location of the spill, the material spilled, the amount spilled and when it was cleaned up. If there is no one available to take the information, leave a message on the recorder. The only exception to this rule are spills of mineral oil or lubricant, no reporting requirements are needed for these two items if spilled.

For large spills the senior supervisor should notify Environmental Affairs during the first shift on weekdays and the guards on off shifts and weekends. The guards are instructed to phone the reported spill to someone from Environmental Affairs at home. The senior supervisor should always follow-up with a hand written note on the incident. It is imperative that all chemical spills be reported to the Environmental Affairs Department immediately. Failure to do so could result in legal action against Cerro Copper Products Co., or the supervisor in charge.

KL-4-5

CERRO COPPER PRODUCTS CO.

INTERNAL MEMORANDUM

Other Addressees
H.L. Schweich (W/O Attach)
J.R. Matcuk (" ")
E. King (" ")
A. Finkelstein (" ")
R.L. Deatherage (" ")
J. D. Burroughs (" ")
J.W. Staples (" ")
S. Bahno (" ")
W. Blacksher (" ")
File

To: Distribution

Date: January 22, 1992

From: J. M. Grana

Subject: Chemical Spill Disaster

Distribution: P. Tandler
R. E. Conreaux
J. Davis
J. Gehlhausen
E. Perschbacher
M. McNerney

Cerro recently has contracted with Riedel Environmental Services as our Chemical Spill or Release Disaster Response. In the event Cerro has a chemical spill or release which can not be handled by Cerro's own personnel, Riedel will respond if called by Cerro. Riedel's local response team in stationed in St. Charles, Missouri. Since Riedel is a national company, they can also be used in the event one of our shipments of hazardous materials (slimes, nickel sulfate, sludges, etc.) is involved in a transportation spill incident.

Riedel has been given the names of those individuals under this memo's distribution list along with myself as the only authorized initiators for Riedel to respond to a chemical spill or release. Below is the procedure for initiating a Chemical Spill or Release Disaster Response by Riedel.

1. Riedel is only to be called in the event that a chemical spill or release disaster has occurred. A chemical spill or release disaster is defined as a spill or release which can not be absorbed, neutralized or otherwise controlled at the time of the spill or release by Cerro employees in the area of the spill or release or by Cerro maintenance personnel. These are situations which would require outside equipment or expertise in handling the spill or release. It is your decision at the time of the incident on whether our employees should respond or if the spill or release is beyond the capability of our employees and/or the spill equipment Cerro maintains at the plant. Examples of a Chemical Spill or Release Disaster are:

a. Chemical tanker truck for sulfuric acid, sodium hydroxide, solvent, gasoline, fuel oil or mineral spirits, has an accident spilling the entire contents of the truck.

b. The storage tanks for the above chemicals ruptures causing widespread contamination.

VI-4-4

c. Natural disaster (fire, tornado, earthquake) causing chemical storage areas to release chemicals to the environment.

2. When a chemical spill or release disaster occurs place a phone call to Riedel at 1-800-334-0004 and provide the following information.

a. Your name and company job title.

b. Company name, address (3000 Mississippi Ave or Illinois Route 3) and company phone number.

c. Location of the spill or release & the chemical(s) involved in the spill or release.

d. Approximate time of the spill or release.

e. Nature of the spill or release (storage tank rupture, tanker truck accident, if the spill is contained or going to sewer, etc)

f. Your phone number if calling from a location other than your office. They have been instructed to phone you back to confirm the call.

3. Cerro can limit the notice to Riedel to a "mobilization-standby". Riedel will not dispatch equipment or personnel to the scene but will prepare for a second call from Cerro authorizing mobilization.

4. When Riedel arrives at the spill or release scene, you will again be asked to authorize them to respond to the spill or release.

I have attached Riedel's current rate schedule. In a couple days I will send you stickers with Riedel's emergency phone number on it.

P. Tandler
M. McNerney

OTHER ADDRESSEES · FOR INFORMATION

VI-4-5

CERRO COPPER PRODUCTS CO.

INTERNAL MEMORANDUM

HQ-10 SHOW NAME, TITLE AND UNIT OF ADDRESSEE AND ADDRESSOR

TO: All Maintenance Supervisors DATE: January 7, 1992

FROM: M. McNerney

SUBJECT: EMERGENCY SPILL SUPPLIES

A serious spill of hazardous materials such as the rupture of a large solvent storage tank would be handled by an outside contractor, but there are other more likely spills of a less severe nature that Cerro personnel, with proper supervision, can take care of. The priority in any situation is to safeguard our employees and contain a spill. It is likely that Maintenance will be notified in a situation such as this and should be prepared to assist. Arrangements have been made to provide the necessary supplies and tools to Maintenance and Production for rapid response.

For this purpose, emergency supplies, tools, etc. are stored on a cart located in the center aisle vault in the concrete building. The vault is identified and locked with the key located in the outer Foundry Maintenance Office.

In the event you are notified of a potential problem, at your discretion, go ahead and move the cart to the spill area. Included with the cart are Material Safety Data Sheets which will detail the correct procedures for each substance.

Above all, work safety - remember to isolate the area first following procedures explained during your chemical spill training.

Mike M. McNerney

MM/gd

1/8/92

Bob Deatherage

I would like a lock put on this door with a key for the Foundry Maint shop one for the guards and the lock should be [illegible] 3/ Jan.

STORES PART #	
20-01253	BARRICADE TAPE, BLACK CAUTION ON YELLOW BACKGROUND
20-01109	SAFETY CONE 36"
20-01110	SAFETY CONE 18"
20-01276	FIRE HOSE 100 FT. 1 1/2"
20-01280	FIRE HOSE 50 FT. 2 1/2"
20-01277	FOG NOZZLE 1 1/2"
20-01281	FIRE HOSE ADAPTERS 2 1/2" X 1 1/2"
20-01289	FIRE HOSE WRENCH
20-01282	FIRE HYDRANT WRENCH
20-01020A	RUBBER GLOVES
20-01504	GLOVES, NITRILE SIZE 10
20-01505	GLOVES, NITRILE SIZE 11
20-01114A	HARD HAT BRACKET FOR 20-01114B FACE SHIELD
20-01114B	FACE SHIELD USE WITH 20-01114A HARD HAT BRACKET
20-01205	CHEMICAL SPLASH GOGGLES - MFG. BY JACKSON
20-01209A	CHEMICAL SPLASH GOGGLES
20-01211	KNEE BOOTS SIZE 7
20-01212	KNEE BOOTS SIZE 8
20-01213	KNEE BOOTS SIZE 9
20-01216	KNEE BOOTS SIZE 10
20-01217	KNEE BOOTS SIZE 11
20-01218	KNEE BOOTS SIZE 12
20-01219	KNEE BOOTS SIZE 13
20-01500	BOOTS, LATEX LIGHT DUTY MEDIUM
20-01501	BOOTS, LATEX LIGHT DUTY: X-LARGE
20-01502	COVERALLS W/HOOD DISPOSABLE: LARGE
20-01503	COVERALLS W/HOOD DISPOSABLE: X-LARGE
20-01207	3M DUST RESPIRATOR
20-01337	3M SERIES 6000 EASI-CARE DUAL CARTRIDGE RESPIRATOR * WITH ORGANIC VAPOR ONLY CARTRIDGE INSTALLED
20-01448	PRO-TECH 1694 FULL FACE GASMASK USE CARTRIDGES STORES #20-01209
20-01209	PRO-TECH 1694 REPLACEMENT CARTIDGE TYPE J FOR ORGANIC VAPORS, DUSTS, MISTS, ACIDS GAS & RADIONUCLIDES MFG #:G104&G208
20-01441	RESPIRATOR COMFO II WITH CARTRIDGES INSTALLED FOR PAINTERS
20-01442	CARTRIDGES FOR COMFO II RESPIRATOR (MFG. #: 464031)(ORGANIC VAPORS ONLY)
20-01443	PREFILTER FOR COMFO II RESPIRATOR WITH 20-01442 & 01449 FOR PAINT
20-01449	FILTER COVER FOR COMFO II RESPIRATOR WITH 20-01442 & 01443 FOR PAINT
20-01451	RESPIRATOR COMFO II WITHOUT CARTRIDGES
20-01450	MSA COMBINATION CARTRIDGE TYPE GMC-H MFG.# 464027 FOR COMFO II RESPIRATOR FOR ORGANIC VAPORS, CHLORINE, HYDROCHLORIC ACID, SULFUR DIOXIDE, CHLORINE DIOXIDE, HYDROGEN SULFIDE AND DUST, MISTS AND FUMES
00-05085	SORBENT PILLOWS
00-05086	SORBENT TUBES
00-03011	OIL DRY
-03090	RAGS

OVERPACK DRUMS LOCATION AT IN THE HAZARDOUS WASTE STORAGE AREA AT RECLAMATION SITE
SODIUM BICARBINATE FOR ACID SPILL NEUTRALIZATION STORED AT WRP1
ORANGE BARRICADE BARRELS STORED NEAR EMERGENCY DISASTER EQUIPMENT STORAGE BUILDING

II-1-17

MAIN TUBE MILL
FIRE WATER LOCATIONS

VT-5-1

AIR CONTAMINANT EMISSIONS ALERT
GUIDELINES FOR MAINTENANCE & PRODUCTION SUPERVISORS
FEBRUARY 1990

In the event of the release of airborne hazardous material from one of the neighboring chemical plants, the Emission Alert Siren will sound. This siren is located on the northern boundary of our plant with Monsanto facing our direction. The siren is a high pitch steady tone that will last 4 minutes. The siren is tested at 2:00 p.m.the first Tuesday of the month .

It is not possible to provide a set of "hard and fast" rules to follow in case of this emergency. However there is no substitute for good judgement and there are some general procedures to follow when the siren is heard.

If you have not been alerted to a release, but hear the siren contact the supervisor in charge of your Department. The production and maintenance area supervisors in charge should call the guard's office to alert them and to determine the status of the alert and the wind direction. However, the guards will probably already have been alerted from either the offending company or the Sauget emergency team. Security should be sure both production and the maintenance departments are alerted. The Tube Mill Maintenance Supervisor should alert the Machine Shop.

If you are alerted by the guard of a release, supervisors in charge should keep in mind the following:

1. Exposure to the hazard will be much less inside buildings than outside. Preferably inside enclosures with ventilation systems such as offices, rest areas and locker rooms.

2. Close all doors, windows and building openings. This will increase the protection inside the building.

3. Respirators are not effective devices to remove fumes unless the respirator has a cartridge for the specific fume. Respirators are also not effective on fumes that attack the eyes or skin. The best protection is to stay inside a sealed building.

4 Plant communications and instructions should be maintained between the senior area supervisor and the guards.

5 Machinery must be left in a safe condition.

6. If an emission enters an area, the department superintendent or supervisor in charge will make the decision to move the personnel away from the area

7. A plant-wide evacuation would not be expected but may be called by the Plant Manager, Vice President or the Company President. In their absence Department Supervisors should start an evacuation if local authorities recommend such an action to our Security Force which will communicate this to senior department supervisors.

8. The all clear siren is a low pitched siren lasting 3 minutes.

2/14/90

VII-5-2

CERRO COPPER PRODUCTS CO.

INTERNAL MEMORANDUM

HQ-10 SHOW NAME, TITLE AND UNIT OF ADDRESSEE AND ADDRESSOR

OTHER ADDRESSEES · FOR INFORMATION
J. Hintz
J. Sundstrom
P. Tandler
R. E. Conreaux
A. Finkelstein
J. Schuster J. Grana
J. Davis
E. Perschbacher
M. McNerney
R. Deatherage File

TO: John Gehlhausen

DATE: January 24, 1992

FROM: Scott Bahno

SUBJECT: EMISSION ALERT SYSTEM - REVISION

In the event there is a release of an airborne contaminant from one of the neighboring chemical plants, the emission alert siren will sound as indicated on the attached description. The siren is located near the northern boundary of our plant next to Monsanto, facing our direction.

Should such a release occur, the facility releasing the contaminant has a checklist of procedures to follow including: various state and federal agencies to alert, the Sauget Police and if needed, the Sauget Fire Department. If our facility were to be affected by a release, our Security Department would be contacted by the facility suffering the release. In the event Security is notified of a release, they should obtain the following information from the contacting facility:

1. Wind direction
2. Contaminant released
3. Concentration of release
4. Other pertinent information.

Security should then contact each department head, alerting them to the situation.

The proper course of action to take according to Monsanto officials, if our facility were to be affected by such a release, would be to proceed directly to an inside enclosure such as an office, break room, etc. If this space has an air conditioning unit, the "ventilation" control should be placed in the CLOSED position to prevent airborne contaminants from entering. Doors and windows should be closed securely. Stay put until the "all clear" siren is sounded, or directed by management.

As a reminder, be sure to place any machinery into a "safe" condition prior to leaving your work area.

Scott E. Bahno

SEB/ge

Attachment

EARTHQUAKES

Earthquakes usually occur without warning and employees must move to previously designated evacuation areas at the first sign of shaking to avoid injury. In addition, the Emergency Coordinator will have to anticipate the following:

1. General panic and confusion.
2. Building collapse or severe structural damage.
3. Disruption of all utilities.
4. Loss of public fire protection water supplies.
5. Loss of outside aid such as fire and police departments and ambulance service.
6. Rescue of injured employees and transport to trauma centers.

To be prepared for an earthquake, the following must be done before a quake strikes:

1. Survey the plant to determine what equipment or items may topple or slide during a quake. Take steps to secure the items and consider the following modifications:
    a. Fit shelves with high lips or place rods or chains across shelf openings to secure them.
    b. Store valuable objects in closed cabinets.
    c. Store chemicals in unbreakable containers, at floor level. Do not store chemicals that react against each other in the same place.
    d. Lock brakes on all material handling equipment not being used.

EARTHQUAKES (Cont'd.)

e. Allow adequate clearance around piping passing through walls and floors. Use flexible couplings or flexible piping, if possible.

f. Install sway bracing on all piping.

g. Upgrade mountings, fasteners, connectors, etc., on existing equipment to improve earthquake resistance.

h. Consider seismic adequacy on all new installations such as boilers, machinery and switchgear.

i. Anchor and properly brace all equipment, especially tanks.

j. Install instruments to monitor seismic disturbances.

2. Protect fire protection equipment.

3. Assemble emergency supplies, including portable generators, food, communications equipment and medical suppies in an earthquake resistant place.

If an earthquake strikes, follow these rules:

1. Don't panic.

2. Once the shaking stops, evacuate the plant in an orderly fashion. Assemble at a pre-determined location and take a head count. (See evacuation section of this guide.)

3. Shut off utilities and hazardous material lines.

4. Fight fires that may have developed.

5. Get in touch with Civil Defense authorities.

6. Assess damage.

7. Initiate rescue and salvage operations.

EARTHQUAKES (Cont'd.)

8. Stay out of structures weakened by the quake.

9. Be alert for aftershocks. Aftershocks have been known to be just as damaging as the original quake.

10. Have alternate plans for transportation of injured persons, such as company cars, employee cars and even outside helicopter use, if available.

APPENDIX C

DOCUMENTATION OF PLAN RECEIPT

CERRO COPPER PRODUCTS CO.
P.O. Box 66800
St. Louis, MO 63166-6800
618/337-6000

October 26, 1992

Mr. Donald Snyder
Memorial Hospital
4501 North Park Drive
Belleville, IL. 62223

Re: Contingency, Emergency & Preparedness Plan

Dear Mr. Snyder:

Enclosed please find a revised copy of the CERRO COPPER PRODUCTS EMERGENCY RESPONSE PLAN. This information is provided to your organization to assist your personnel in having the proper emergency services available should an occurrence at our facility cause the plan to be implemented such that your services become necessary.

The delivery of the Plan to an organization such as yourself is mandated by the State of Illinois regulation 35 Illinois Administrative Code 724.137, which is enforced by the Illinois Environmental Protection Agency. The regulations also require that we ask those organizations to acknowledge receipt of the Plan. To provide documentation of your receipt of the Plan, please have a member of your management staff or yourself sign the bottom of this letter and return it to my attention at the address in the letterhead. I recommend that you retain a copy of this letter following you signature.

Cerro appreciates your assistance in this matter.

Very truly yours,

CERRO COPPER PRODUCTS

Joseph M. Grana
Manager of Environmental
and Energy Affairs

Ronald E Schneider
(Signature)

Donald E Schneider
(Name)

Director of Safety & Se
(Title)

Nov 23, 1992
(Date)

CERRO COPPER PRODUCTS CO.
P.O. Box 66800
St. Louis, MO 63166-6800
618/337-8000

October 26, 1992

Mr. Patrick Delaney, Chief
Village of Sauget Police Department
2897 Falling Springs Road
Sauget, IL 62206

Re: Contingency, Emergency & Preparedness Plan

Dear Chief Delaney:

Enclosed please find a revised copy of the CERRO COPPER PRODUCTS EMERGENCY RESPONSE PLAN. This information is provided to your organization to assist your personnel in having the proper emergency services available should an occurrence at our facility cause the plan to be implemented such that your services become necessary.

The delivery of the Plan to an organization such as yourself is mandated by the State of Illinois regulation 35 Illinois Administrative Code 724.137, which is enforced by the Illinois Environmental Protection Agency. The regulations also require that we ask those organizations to acknowledge receipt of the Plan. To provide documentation of your receipt of the Plan., please have a member of your management staff or yourself sign the bottom of this letter and return it to my attention at the address in the letterhead. I recommend that you retain a copy of this letter following you signature.

Cerro appreciates your assistance in this matter.

Very truly yours,

CERRO COPPER PRODUCTS

Joseph M. Grana
Manager of Environmental
and Energy Affairs

Patrick K Delaney
(Signature)

PATRICK K DELANEY
(Name)

CHIEF OF POLICE
(Title)

11-30-92
(Date)

CERRO COPPER PRODUCTS CO.
P.O. Box 66800
St. Louis, MO 63166-6800
618/337-6000

October 26, 1992

Mr. George Salsman
St. Mary's Hospital
3120 State Street
East St. Louis, IL 62205

Re: Contingency, Emergency & Preparedness Plan

Dear Mr. Salsman:

Enclosed please find a revised copy of the CERRO COPPER PRODUCTS EMERGENCY RESPONSE PLAN. This information is provided to your organization to assist your personnel in having the proper emergency services available should an occurrence at our facility cause the plan to be implemented such that your services become necessary.

The delivery of the Plan to an organization such as yourself is mandated by the State of Illinois regulation 35 Illinois Administrative Code 724.137, which is enforced by the Illinois Environmental Protection Agency. The regulations also require that we ask those organizations to acknowledge receipt of the Plan. To provide documentation of your receipt of the Plan, please have a member of your management staff or yourself sign the bottom of this letter and return it to my attention at the address in the letterhead. I recommend that you retain a copy of this letter following you signature.

Cerro appreciates your assistance in this matter.

Very truly yours,

CERRO COPPER PRODUCTS

Joseph M. Grana
Manager of Environmental
and Energy Affairs

George Salsman
(Signature)

George Salsman
(Name)

Chief of Safety & Security
(Title)

10/27/92
(Date)

CERRO COPPER PRODUCTS CO.
P.O. Box 66800
St. Louis, MO 63166-6800
618/337-6000

October 26, 1992

Mr. Roger Thornton, Chief
Village of Sauget Fire Department
2897 Falling Springs Road
Sauget, IL 62206

Re: Contingency, Emergency & Preparedness Plan

Dear Chief Thornton:

Enclosed please find a revised copy of the CERRO COPPER PRODUCTS EMERGENCY RESPONSE PLAN. This information is provided to your organization to assist your personnel in having the proper emergency services available should an occurrence at our facility cause the plan to be implemented such that your services become necessary.

The delivery of the Plan to an organization such as yourself is mandated by the State of Illinois regulation 35 Illinois Administrative Code 724.137, which is enforced by the Illinois Environmental Protection Agency. The regulations also require that we ask those organizations to acknowledge receipt of the Plan. To provide documentation of your receipt of the Plan, please have a member of your management staff or yourself sign the bottom of this letter and return it to my attention at the address in the letterhead. I recommend that you retain a copy of this letter following you signature.

Cerro appreciates your assistance in this matter.

Very truly yours,

CERRO COPPER PRODUCTS

Joseph M. Grana
Joseph M. Grana
Manager of Environmental
and Energy Affairs

Roger Thornton
(Signature)

Roger Thornton
(Name)

Chief
(Title)

10-28-92
(Date)

CERRO COPPER PRODUCTS CO.
P.O. Box 66800
St. Louis, MO 63166-6800
618/337-6000

October 26, 1992

Mr. Bill Schreiber
St. Clair County Emergency Services
and Disaster Agency
321 West "F" Street
Belleville, IL 62220

Re: Contingency, Emergency & Preparedness Plan

Dear Mr. Schreiber:

Enclosed please find a revised copy of the CERRO COPPER PRODUCTS EMERGENCY RESPONSE PLAN. This information is provided to your organization to assist your personnel in having the proper emergency services available should an occurrence at our facility cause the plan to be implemented such that your services become necessary.

The delivery of the Plan to an organization such as yourself is mandated by the State of Illinois regulation 35 Illinois Administrative Code 724.137, which is enforced by the Illinois Environmental Protection Agency. The regulations also require that we ask those organizations to acknowledge receipt of the Plan. To provide documentation of your receipt of the Plan, please have a member of your management staff or yourself sign the bottom of this letter and return it to my attention at the address in the letterhead. I recommend that you retain a copy of this letter following you signature.

Cerro appreciates your assistance in this matter.

Very truly yours,

CERRO COPPER PRODUCTS

Joseph M. Grana
Manager of Environmental
and Energy Affairs

William Schreiber
(Signature)

WILLIAM SCHREIBER
(Name)

Coordinator
(Title)

10-27-92
(Date)

APPENDIX D

TANK INSPECTION FORMS

REVISED

HAZARDOUS WASTE DAILY INSPECTION LOG FOR _____(month) _____(year)
FOR RECLAMATION AREA.

DAY	ANY LEAKS OR CORROSION? DRUMS	TANKS	CONTAIN.	HI-LEVEL ALARM	CONTAIN. CLEAR	ACCESS CLEAR?	REMARKS ON BACK?	BY (INITIALS)
1								
2								
3								
4								
5								
6								
7								
8								
9								
10								
11								
12								
13								
14								
15								
16								
17								
18								
19								
20								
21								
22								
23								
24								
25								
26								
27								
28								
29								
30								
31								

qpro\hazwst.frm FORM TO J. BURROUGHS WHEN COMPLETED

APPENDIX E

LAND DISPOSAL RESTRICTION NOTIFICATIONS

CERRO COPPER PRODUCTS CO.
P.O. Box 66800
St. Louis, MO 63166-6800
618/337-6000

October 20, 1992

Holnam, Inc./Safety-Kleen
P.O. Box 456
Clarksville, Missouri 63336

Customer Service Representative:

A RCRA Inspection by Illinois E.P.A. on this date pointed out a discrepancy which we need your help to correct. For a period of time after the Land Ban sheets were required to be sent with the manifest we failed to copy those sheets for our files. Would you please, at your convenience, photocopy the Land Ban sheets accompanying the following manifested shipments to your facility. We are very appreciative of the services you have provided in the past and will be grateful for your assistance in this matter.

Shipment Date	Manifest Number	Missouri Manifest Number
November 12, 1990	00006	10478-0006
December 26, 1990	00007	10478-0007
January 21, 1991	00001	10478-0001
February 11, 1991	00002	10478-0002
March 11, 1991	00003	10478-0003
April 4, 1991	00004	10478-0004
April 23, 1991	00005	10478-0005
May 8, 1991	00006	10478-0006
July 8, 1991	00010	10478-0010
August 27, 1991	00012	10478-0012
October 23, 1991	00015	10478-0012
November 20, 1991	00017	10478-0017
February 13, 1992	00003	10478-0001
March 20, 1992	00004	10478-0004
May 14, 1992	00006	10478-0006

Again, your assistance will be appreciated.

Very truly yours,

CERRO COPPER PRODUCTS CO.

Joe D. Burroughs
Environmental Engineer

NOTICE OF LAND DISPOSAL RESTRICTION OF WASTE

1990

HOLNAM / SAFETY-KLEEN EPA ID NO: MOD029729688
S.E. HIGHWAY 79 NORTH
CLARKSVILLE, MO 63336

Under manifest number 00006 line number 11a. (enter 11a, 11b, 11c, OR 11d) the Generator noted below is shipping to you a waste determined to be restricted under 40 CRF Part 268. In accordance with 40 CFR 268.7, the generator hereby provides notice that the waste is restricted and the EPA waste code and the appropriate treatment standards are as follows:

EPA Waste Codes: ~~D000-D004~~ D001, D005, D008

F001-F005 Spent Solvents

Regulated Hazardous Constituent	TREATMENT STANDARDS (mg/l) Wastewater w/Solvents	All Other Solvent Wastes	Check All That Apply
Acetone	0.05	0.59	____
Benzene	0.07	3.7	____
n-Butyl alcohol	5.0	5.0	____
Carbon disulfide	1.05	4.81	____
Carbon tetrachloride	0.05	0.96	____
Chlorobenzene	0.15	0.05	____
Cresols (and cresylic acid)	2.82	0.75	____
Cyclohexanone	0.125	0.75	____
1,2-Dichlorobenzene	0.68	0.125	____
Ethyl acetate	0.05	0.75	____
Ethyl benzene	0.05	0.053	____
Ethyl ether	0.05	0.75	____
Isobutanol	5.0	5.0	____
Methanol	0.25	0.75	____
Methylene chloride	0.2	0.96	____
Methylene chloride(from Pharm. Industry)	0.44	0.96	____
Methyl ethyl ketone	0.05	0.75	____
Methyl isobutyl ketone	0.05	0.33	____
Nitrobenzene	0.65	0.125	____
Pyridine	1.12	0.33	____
Tetrachloroethlyene	0.079	0.05	____
Toluene	1.12	0.33	____
1,1,1-Trichloroethane	1.05	0.41	____
1,1,2-Trichloroethane	0.03	7.6	____
1,1,2-Trichloro-1,2,2-trifluoroethane	1.05	0.96	____
Trichlorethylene	0.062	0.091	____
Trichlorofluoromethane	0.05	0.96	____
Xylene	0.05	0.15	____

California List Prohibited Wastes	Level (mg/l)	Treatment Standard
Halogenated Organic Compounds	1000.0	Incineration ____
Arsenic (As) Nonwastewaters	500.0	None ____
Mercury (Hg) Nonwastewaters	20.0	None ____
Nickel (Ni)	134.0	None ____
Thallium (Tl)	130.0	None ____
Chlorinated Biphenyls (PCB's)	50.0	Incineration ____

Waste Descriptions and/or Treatment Subcategory

Waste Code	Description	Treatment Standards Reference in 40 CFR and Technology Codes for 40 CFR 268.42(a) Wastewaters	Check All That Apply	Nonwastewaters	Check All That Apply	
D001:	Wastewaters (<1.0 wt% TOC and TSS)	268.42(a) DEACT	X	NA		
	Low TOC Ignitable Liquids (<10 wt% TOC)	NA		268.42(a) DEACT	____	
	High TOC Ignitable Liquids (>10 wt% TOC)	NA		268.42(a) RORGS, FSUBS, or INCIN	____	
D002	Corrosives, all subcategories & CA list	268.42(a) DEACT	____	268.42(a) DEACT	____	
D004	Arsenic (As)	268.43(a)	____	268.41(a)	____	Variance until 5-8-92
D005	Barium (Ba)	268.43(a)	X	268.41(a)	____	
D006	Cadmium (Cd)	268.43(a)	____	268.41(a)	____	
D007	Chromium (Cr)	268.43(a)	____	268.41(a)	____	
D008	Lead (Pb)	268.43(a)	X	268.41(a)	____	
D009:	Low Mercury Subcategory (<260 ppm Hg)	268.43(a)	____	268.41(a)	____	Variance until 5-8-92
	High Mercury Subcategory (>=260 ppm Hg)	268.43(a)	____	268.42(a) RMERC	____	Variance until 5-8-92
D010	Selenium (Se)	268.43(a)	____	268.41(a)	____	
D011	Silver (Ag)	268.43(a)	____	268.41(a)	____	
Other Codes	See attachment for supplemental list		____		____	

Generator Name: CERRO COPPER PRODUCTS Co. EPA ID: ILD080018914

Generator Representative Signature: Joe D. Burroughs

Name & Title of Representative: JOE D. BURROUGHS, ENVIRON. ENGR.

Safety-Kleen Sample Number: 089922 Control Number: 0060298-5

NOTICE OF LAND DISPOSAL RESTRICTION OF WASTE

90

Quad/Safety-Kleen EPA ID NO: MOD 029729688
Ebony 79N. P.O. Box 456
Clarksville, MO 63336

Under manifest number 00007 line number 11a. (enter 11a, 11b, 11c, OR 11d) the Generator noted below is shipping to you a waste determined to be restricted under 40 CFR Part 268. In accordance with 40 CFR 268.7, the generator hereby provides notice that the waste is restricted and the EPA waste code and the appropriate treatment standards are as follows:

EPA Waste Codes: D008 F001 D005 ~~D001~~

F001-F005 Spent Solvents	TREATMENT STANDARDS (mg/l) Wastewater w/Solvents	All Other Solvent Wastes	Check All That Apply
Regulated Hazardous Constituent			
Acetone	0.05	0.59	
Benzene	0.07	3.7	
n-Butyl alcohol	5.0	5.0	
Carbon disulfide	1.05	4.81	
Carbon tetrachloride	0.05	0.96	
Chlorobenzene	0.15	0.05	
Cresols (and cresylic acid)	2.82	0.75	
Cyclohexanone	0.125	0.75	
1,2-Dichlorobenzene	0.68	0.125	
Ethyl acetate	0.05	0.75	
Ethyl benzene	0.05	0.053	
Ethyl ether	0.05	0.75	
Isobutanol	5.0	5.0	
Methanol	0.25	0.75	
Methylene chloride	0.2	0.96	
Methylene chloride(from Pharm. Industry)	0.44	0.96	
Methyl ethyl ketone	0.05	0.75	
Methyl isobutyl ketone	0.05	0.33	
Nitrobenzene	0.65	0.125	
Pyridine	1.12	0.33	
Tetrachloroethylene	0.079	0.05	
Toluene	1.12	0.33	X
1,1,1-Trichloroethane	1.05	0.41	X
1,1,2-Trichloroethane	0.03	7.6	
1,1,2-Trichloro-1,2,2-trifluoroethane	1.05	0.96	
Trichloroethylene	0.062	0.091	
Trichlorofluoromethane	0.05	0.96	
Xylene	0.05	0.15	

California List Prohibited Wastes	Level (mg/l)	Treatment Standard	
Halogenated Organic Compounds	1000.0	Incineration	X JWB per Chemtrol
Arsenic (As) Nonwastewaters	500.0	None	
Mercury (Hg) Nonwastewaters	20.0	None	
Nickel (Ni)	134.0	None	
Thallium (Tl)	130.0	None	
Chlorinated Biphenyls (PCB's)	50.0	Incineration	

Waste Descriptions and/or Treatment Subcategory		Treatment Standards Reference in 40 CFR and Technology Codes for 40 CFR 268.42(a)		Check All That Apply
Waste Code	Description	Wastewaters	Nonwastewaters	
D001:	Wastewaters (<1.0 wt% TOC and TSS)	268.42(a) DEACT	NA	
	Low TOC Ignitable Liquids (<10 wt% TOC)	NA	268.42(a) DEACT	X
	High TOC Ignitable Liquids (>10 wt% TOC)	NA	268.42(a) RORGS, FSUBS, or INCIN	
D002	Corrosives, all subcategories & CA list	268.42(a) DEACT	268.42(a) DEACT	
D004	Arsenic (As)	268.43(a)	268.41(a)	Variance until 5-8-9
D005	Barium (Ba)	268.43(a)	268.41(a)	X
D006	Cadmium (Cd)	268.43(a)	268.41(a)	
D007	Chromium (Cr)	268.43(a)	268.41(a)	
D008	Lead (Pb)	268.43(a)	268.41(a)	X
D009:	Low Mercury Subcategory (<260 ppm Hg)	268.43(a)	268.41(a)	Variance until 5-8-9
	High Mercury Subcategory (>=260 ppm Hg)	268.43(a)	268.42(a) RMERC	Variance until 5-8-9
D010	Selenium (Se)	268.43(a)	268.41(a)	
D011	Silver (Ag)	268.43(a)	268.41(a)	
Other Codes	See attachment for supplemental list			

Generator Name: Cerro Copper Products Co EPA ID: ILD060018814

Generator Representative Signature: Don D. Burroughs

Name & Title of Representative: Don D. Burroughs Environ. Engr.

Safety-Kleen Sample Number: 089922 Control Number: 0060298-5

NOTICE OF LAND DISPOSAL RESTRICTION OF WASTE

TO: HOLNAM/SAFETY KLEEN EPA ID NO: MOD 029 729 688
P.O. Box 456
CLARKSVILLE, MO 63336

91

Under manifest number 00001 line number 11a. (enter 11a, 11b, 11c, OR 11d) the Generator noted below is shipping to you a waste determined to be restricted under 40 CRF Part 268. In accordance with 40 CFR 268.7, the generator hereby provides notice that the waste is restricted and the EPA waste code and the appropriate treatment standards are as follows:

EPA Waste Codes: D008 F001 ,D005, D001 BW

F001-F005 Spent Solvents	TREATMENT STANDARDS (mg/l) Wastewater w/Solvents	All Other Solvent Wastes	Check All That Apply
Regulated Hazardous Constituent			
Acetone	0.05	0.59	___
Benzene	0.07	3.7	___
n-Butyl alcohol	5.0	5.0	___
Carbon disulfide	1.05	4.81	___
Carbon tetrachloride	0.05	0.96	___
Chlorobenzene	0.15	0.05	___
Cresols (and cresylic acid)	2.82	0.75	___
Cyclohexanone	0.125	0.75	___
1,2-Dichlorobenzene	0.68	0.125	___
Ethyl acetate	0.05	0.75	___
Ethyl benzene	0.05	0.053	___
Ethyl ether	0.05	0.75	___
Isobutanol	5.0	5.0	___
Methanol	0.25	0.75	___
Methylene chloride	0.2	0.96	___
Methylene chloride(from Pharm. Industry)	0.44	0.96	___
Methyl ethyl ketone	0.05	0.75	___
Methyl isobutyl ketone	0.05	0.33	___
Nitrobenzene	0.65	0.125	___
Pyridine	1.12	0.33	___
Tetrachloroethlyene	0.079	0.05	___
Toluene	1.12	0.33	X
1,1,1-Trichloroethane	1.05	0.41	X
1,1,2-Trichloroethane	0.03	7.6	___
1,1,2-Trichloro-1,2,2-trifluoroethane	1.05	0.96	___
Trichlorethylene	0.062	0.091	___
Trichlorofluoromethane	0.05	0.96	___
Xylene	0.05	0.15	___

California List Prohibited Wastes	Level (mg/l)	Treatment Standard	
Halogenated Organic Compounds	1000.0	Incineration	___
Arsenic (As) Nonwastewaters	500.0	None	___
Mercury (Hg) Nonwastewaters	20.0	None	___
Nickel (Ni)	134.0	None	___
Thallium (Tl)	130.0	None	___
Chlorinated Biphenyls (PCB's)	50.0	Incineration	___

Waste Descriptions and/or Treatment Subcategory		Treatment Standards Reference in 40 CFR and Technology Codes for 40 CFR 268.42(a)				Check All That Apply
Waste Code	Description	Wastewaters		Nonwastewaters		
D001:	Wastewaters (<1.0 wt% TOC and TSS)	268.42(a) DEACT	___	NA		
	Low TOC Ignitable Liquids (<10 wt% TOC)	NA		268.42(a) DEACT	___	
	High TOC Ignitable Liquids (>10 wt% TOC)	NA		268.42(a) RORGS, FSUBS, or INCIN	X	
D002	Corrosives, all subcategories & CA list	268.42(a) DEACT	___	268.42(a) DEACT	___	
D004	Arsenic (As)	268.43(a)	___	268.41(a)	___	Variance until 5-8-92
D005	Barium (Ba)	268.43(a)	___	268.41(a)	X	
D006	Cadmium (Cd)	268.43(a)	___	268.41(a)	___	
D007	Chromium (Cr)	268.43(a)	___	268.41(a)	___	
D008	Lead (Pb)	268.43(a)	___	268.41(a)	X	
D009:	Low Mercury Subcategory (<260 ppm Hg)	268.43(a)	___	268.41(a)	___	Variance until 5-8-92
	High Mercury Subcategory (>=260 ppm Hg)	268.43(a)	___	268.42(a) RMERC	___	Variance until 5-8-92
D010	Selenium (Se)	268.43(a)	___	268.41(a)	___	
D011	Silver (Ag)	268.43(a)	___	268.41(a)	___	
Other Codes	See attachment for supplemental list		___		___	

Generator Name: CERRO COPPER PRODUCTS CO. EPA ID: ILD080018914

Generator Representative Signature: Joe D. Burroughs

Name & Title of Representative: JOE D. BURROUGHS, ENVIRON. ENGR.

Safety-Kleen Sample Number: 089922 Control Number: 006298-5

NOTICE OF LAND DISPOSAL RESTRICTION OF WASTE

TO: HOLNAM/SAFETY-KLEEN EPA ID NO: MOD 029729688
HIGHWAY 79 NORTH
CLARKSVILLE, MO 63336

91

Under manifest number 00007 line number 11a. (enter 11a, 11b, 11c, OR 11d) the Generator noted below is shipping to you a waste determined to be restricted under 40 CRF Part 268. In accordance with 40 CFR 268.7, the generator hereby provides notice that the waste is restricted and the EPA waste code and the appropriate treatment standards are as follows:

EPA Waste Codes: D008 D001 D005

F001-F005 Spent Solvents	TREATMENT STANDARDS (mg/l) Wastewater w/Solvents	All Other Solvent Wastes	Check All That Apply
Regulated Hazardous Constituent			
Acetone	0.05	0.59	____
Benzene	0.07	3.7	____
n-Butyl alcohol	5.0	5.0	____
Carbon disulfide	1.05	4.81	____
Carbon tetrachloride	0.05	0.96	____
Chlorobenzene	0.15	0.05	____
Cresols (and cresylic acid)	2.82	0.75	____
Cyclohexanone	0.125	0.75	____
1,2-Dichlorobenzene	0.68	0.125	____
Ethyl acetate	0.05	0.75	____
Ethyl benzene	0.05	0.053	____
Ethyl ether	0.05	0.75	____
Isobutanol	5.0	5.0	____
Methanol	0.25	0.75	____
Methylene chloride	0.2	0.96	____
Methylene chloride(from Pharm. Industry)	0.44	0.96	____
Methyl ethyl ketone	0.05	0.75	____
Methyl isobutyl ketone	0.05	0.33	____
Nitrobenzene	0.65	0.125	____
Pyridine	1.12	0.33	____
Tetrachloroethlyene	0.079	0.05	____
Toluene	1.12	0.33	____
1,1,1-Trichloroethane	1.05	0.41	____
1,1,2-Trichloroethane	0.03	7.6	____
1,1,2-Trichloro-1,2,2-trifluoroethane	1.05	0.96	____
Trichloroethylene	0.062	0.091	____
Trichlorofluoromethane	0.05	0.96	____
Xylene	0.05	0.15	____

California List Prohibited Wastes	Level (mg/l)	Treatment Standard	
Halogenated Organic Compounds	1000.0	Incineration	____
Arsenic (As) Nonwastewaters	500.0	None	____
Mercury (Hg) Nonwastewaters	20.0	None	____
Nickel (Ni)	134.0	None	____
Thallium (Tl)	130.0	None	____
Chlorinated Biphenyls (PCB's)	50.0	Incineration	____

Waste Descriptions and/or Treatment Subcategory		Treatment Standards Reference in 40 CFR and Technology Codes for 40 CFR 268.42(a) Wastewaters		Nonwastewaters		Check All That Apply
Waste Code	Description					
D001:	Wastewaters (<1.0 wt% TOC and TSS)	268.42(a) DEACT	____	NA		
	Low TOC Ignitable Liquids (<10 wt% TOC)	NA		268.42(a) DEACT	____	
	High TOC Ignitable Liquids (>10 wt% TOC)	NA		268.42(a) RORGS, FSUBS, or INCIN	X	
D002	Corrosives, all subcategories & CA list	268.42(a) DEACT	____	268.42(a) DEACT	____	
D004	Arsenic (As)	268.43(a)	____	268.41(a)	____	Variance until 5-8-92
D005	Barium (Ba)	268.43(a)	____	268.41(a)	X	
D006	Cadmium (Cd)	268.43(a)	____	268.41(a)	____	
D007	Chromium (Cr)	268.43(a)	____	268.41(a)	____	
D008	Lead (Pb)	268.43(a)	____	268.41(a)	X	
D009:	Low Mercury Subcategory (<260 ppm Hg)	268.43(a)	____	268.41(a)	____	Variance until 5-8-92
	High Mercury Subcategory (>=260 ppm Hg)	268.43(a)	____	268.42(a) RMERC	____	Variance until 5-8-92
D010	Selenium (Se)	268.43(a)	____	268.41(a)	____	
D011	Silver (Ag)	268.43(a)	____	268.41(a)	____	
Other Codes	See attachment for supplemental list		____		____	

Generator Name: CERRO COPPER PRODUCTS CO. EPA ID: ILD080018914

Generator Representative Signature: Joe D Burroughs

Name & Title of Representative: JOE D. BURROUGHS, ENVIRON ENGR.

Safety-Kleen Sample Number: 089922 Control Number: 0060298-5

NOTICE OF LAND DISPOSAL RESTRICTION OF WASTE

TO: HELNAM/SAFETY-KLEEN EPA ID NO: MOD 029729688
SE HWY 79 NORTH
CLARKSVILLE, MO 63336

91

Under manifest number 00003 line number 11a. (enter 11a, 11b, 11c, OR 11d) the Generator noted below is shipping to you a waste determined to be restricted under 40 CRF Part 268. In accordance with 40 CFR 268.7, the generator hereby provides notice that the waste is restricted and the EPA waste code and the appropriate treatment standards are as follows:

EPA Waste Codes: ~~D000-F001~~ D001, D005, D008, F001

F001-F005 Spent Solvents	TREATMENT STANDARDS (mg/l) Wastewater w/Solvents	All Other Solvent Wastes	Check All That Apply
Regulated Hazardous Constituent			
Acetone	0.05	0.59	___
Benzene	0.07	3.7	___
n-Butyl alcohol	5.0	5.0	___
Carbon disulfide	1.05	4.81	___
Carbon tetrachloride	0.05	0.96	___
Chlorobenzene	0.15	0.05	___
Cresols (and cresylic acid)	2.82	0.75	___
Cyclohexanone	0.125	0.75	___
1,2-Dichlorobenzene	0.68	0.125	___
Ethyl acetate	0.05	0.75	___
Ethyl benzene	0.05	0.053	___
Ethyl ether	0.05	0.75	___
Isobutanol	5.0	5.0	___
Methanol	0.25	0.75	___
Methylene chloride	0.2	0.96	___
Methylene chloride(from Pharm. Industry)	0.44	0.96	___
Methyl ethyl ketone	0.05	0.75	___
Methyl isobutyl ketone	0.05	0.33	___
Nitrobenzene	0.65	0.125	___
Pyridine	1.12	0.33	___
Tetrachloroethylene	0.079	0.05	___
Toluene	1.12	0.33	X
1,1,1-Trichloroethane	1.05	0.41	X
1,1,2-Trichloroethane	0.03	7.6	___
1,1,2-Trichloro-1,2,2-trifluoroethane	1.05	0.96	___
Trichloroethylene	0.062	0.091	___
Trichlorofluoromethane	0.05	0.96	___
Xylene	0.05	0.15	___

California List Prohibited Wastes	Level (mg/l)	Treatment Standard	
Halogenated Organic Compounds	1000.0	Incineration	___
Arsenic (As) Nonwastewaters	500.0	None	___
Mercury (Hg) Nonwastewaters	20.0	None	___
Nickel (Ni)	134.0	None	___
Thallium (Tl)	130.0	None	___
Chlorinated Biphenyls (PCB's)	50.0	Incineration	___

Waste Descriptions and/or Treatment Subcategory		Treatment Standards Reference in 40 CFR and Technology Codes for 40 CFR 268.42(a)				Check All That Apply
Waste Code	Description	Wastewaters		Nonwastewaters		
D001:	Wastewaters (<1.0 wt% TOC and TSS)	268.42(a) DEACT	___	NA		
	Low TOC Ignitable Liquids (<10 wt% TOC)	NA		268.42(a) DEACT	___	
	High TOC Ignitable Liquids (>10 wt% TOC)	NA		268.42(a) RORGS, FSUBS, or INCIN	X	
D002	Corrosives, all subcategories & CA list	268.42(a) DEACT	___	268.42(a) DEACT	___	
D004	Arsenic (As)	268.43(a)	___	268.41(a)	___	Variance until 5-8-92
D005	Barium (Ba)	268.43(a)	X	268.41(a)	X	
D006	Cadmium (Cd)	268.43(a)	___	268.41(a)	___	
D007	Chromium (Cr)	268.43(a)	___	268.41(a)	___	
D008	Lead (Pb)	268.43(a)	___	268.41(a)	X	
D009:	Low Mercury Subcategory (<260 ppm Hg)	268.43(a)	___	268.41(a)	___	Variance until 5-8-92
	High Mercury Subcategory (>=260 ppm Hg)	268.43(a)	___	268.42(a) RMERC	___	Variance until 5-8-92
D010	Selenium (Se)	268.43(a)	___	268.41(a)	___	
D011	Silver (Ag)	268.43(a)	___	268.41(a)	___	
Other Codes	See attachment for supplemental list		___		___	

Generator Name: CERRO COPPER PRODUCTS EPA ID: ILD080018914

Generator Representative Signature: Joe D. Burroughs

Name & Title of Representative: JOE D. BURROUGHS ENVIRON. ENGR

Safety-Kleen Sample Number: 089922 Control Number: 00602985

NOTICE OF LAND DISPOSAL RESTRICTION OF WASTE

HOLNAM/

TO: SAFETY-KLEEN EPA ID NO: MOD029729688

HIGHWAY 79 NORTH

CLARKSVILLE, MO 63336

Under manifest number 00004 line number 11a. (enter 11a, 11b, 11c, OR 11d) the Generator noted below is shipping to you a waste determined to be restricted under 40 CRF Part 268. In accordance with 40 CFR 268.7, the generator hereby provides notice that the waste is restricted and the EPA waste code and the appropriate treatment standards are as follows:

91

EPA Waste Codes: D008 F001, D005, D001 pw

F001-F005 Spent Solvents	TREATMENT STANDARDS (mg/l) Wastewater w/Solvents	All Other Solvent Wastes	Check All That Apply
Regulated Hazardous Constituent			
Acetone	0.05	0.59	___
Benzene	0.07	3.7	___
n-Butyl alcohol	5.0	5.0	___
Carbon disulfide	1.05	4.81	___
Carbon tetrachloride	0.05	0.96	___
Chlorobenzene	0.15	0.05	___
Cresols (and cresylic acid)	2.82	0.75	___
Cyclohexanone	0.125	0.75	___
1,2-Dichlorobenzene	0.68	0.125	___
Ethyl acetate	0.05	0.75	___
Ethyl benzene	0.05	0.053	___
Ethyl ether	0.05	0.75	___
Isobutanol	5.0	5.0	___
Methanol	0.25	0.75	___
Methylene chloride	0.2	0.96	___
Methylene chloride(from Pharm. Industry)	0.44	0.96	___
Methyl ethyl ketone	0.05	0.75	___
Methyl isobutyl ketone	0.05	0.33	___
Nitrobenzene	0.65	0.125	___
Pyridine	1.12	0.33	___
Tetrachloroethylene	0.079	0.05	___
Toluene	1.12	0.33	X
1,1,1-Trichloroethane	1.05	0.41	X
1,1,2-Trichloroethane	0.03	7.6	___
1,1,2-Trichloro-1,2,2-trifluoroethane	1.05	0.96	___
Trichloroethylene	0.062	0.091	___
Trichlorofluoromethane	0.05	0.96	___
Xylene	0.05	0.15	___

California List Prohibited Wastes	Level (mg/l)	Treatment Standard	
Halogenated Organic Compounds	1000.0	Incineration	___
Arsenic (As) Nonwastewaters	500.0	None	___
Mercury (Hg) Nonwastewaters	20.0	None	___
Nickel (Ni)	134.0	None	___
Thallium (Tl)	130.0	None	___
Chlorinated Biphenyls (PCB's)	50.0	Incineration	___

Waste Descriptions and/or Treatment Subcategory		Treatment Standards Reference in 40 CFR and Tecnnology Codes for 40 CFR 268.42(a)				Check All That Apply
Waste Code	Description	Wastewaters		Nonwastewaters		
D001:	Wastewaters (<1.0 wt% TOC and TSS)	268.42(a) DEACT	___	NA		
	Low TOC Ignitable Liquids (<10 wt% TOC)	NA		268.42(a) DEACT	___	
	High TOC Ignitable Liquids (>10 wt% TOC)	NA		268.42(a) RORGS, FSUBS, or INCIN	X	
D002	Corrosives, all subcategories & CA list	268.42(a) DEACT	___	268.42(a) DEACT	___	
D004	Arsenic (As)	268.43(a)	___	268.41(a)	___	Variance until 5-8-92
D005	Barium (Ba)	268.43(a)	X	268.41(a)	___	
D006	Cadmium (Cd)	268.43(a)	___	268.41(a)	___	
D007	Chromium (Cr)	268.43(a)	___	268.41(a)	___	
D008	Lead (Pb)	268.43(a)	X	268.41(a)	___	
D009:	Low Mercury Subcategory (<260 ppm Hg)	268.43(a)	___	268.41(a)	___	Variance until 5-8-92
	High Mercury Subcategory (>=260 ppm Hg)	268.43(a)	___	268.42(a) RMERC	___	Variance until 5-8-92
D010	Selenium (Se)	268.43(a)	___	268.41(a)	___	
D011	Silver (Ag)	268.43(a)	___	268.41(a)	___	
Other Codes	See attachment for supplemental list		___		___	

Generator Name: CERRO COPPER PRODUCTS CO. EPA ID: ILD080018914

Generator Representative Signature: Joe D. Burroughs

Name & Title of Representative: JOE D. BURROUGHS ENVIRON. ENGR.

Safety-Kleen Sample Number: 089922 Control Number: 0060298

NOTICE OF LAND DISPOSAL RESTRICTION OF WASTE

HOLNAM / SAFETY-KLEEN

TO: EPA ID NO: MOD029729688

HIGHWAY 79 NORTH

CLARKSVILLE MO 63336

91

Under manifest number 00005 line number 11a. (enter 11a, 11b, 11c, OR 11d) the Generator noted below is shipping to you a waste determined to be restricted under 40 CRF Part 268. In accordance with 40 CFR 268.7, the generator hereby provides notice that the waste is restricted and the EPA waste code and the appropriate treatment standards are as follows:

EPA Waste Codes: D008 F001 ,D005, D001 SW

F001-F005 Spent Solvents	TREATMENT STANDARDS (mg/l) Wastewater w/Solvents	All Other Solvent Wastes	Check All That Apply
Regulated Hazardous Constituent			
Acetone	0.05	0.59	____
Benzene	0.07	3.7	____
n-Butyl alcohol	5.0	5.0	____
Carbon disulfide	1.05	4.81	____
Carbon tetrachloride	0.05	0.96	____
Chlorobenzene	0.15	0.05	____
Cresols (and cresylic acid)	2.82	0.75	____
Cyclonexanone	0.125	0.75	____
1,2-Dichlorobenzene	0.68	0.125	____
Ethyl acetate	0.05	0.75	____
Ethyl benzene	0.05	0.053	____
Ethyl ether	0.05	0.75	____
Isobutanol	5.0	5.0	____
Methanol	0.25	0.75	____
Methylene chloride	0.2	0.96	____
Methylene chloride(from Pharm. Industry)	0.44	0.96	____
Methyl ethyl ketone	0.05	0.75	____
Methyl isobutyl ketone	0.05	0.33	____
Nitrobenzene	0.66	0.125	____
Pyridine	1.12	0.33	____
Tetrachloroethlvene	0.079	0.05	____
Toluene	1.12	0.33	X
1,1,1-Trichloroethane	1.05	0.41	X
1,1,2-Trichloroethane	0.03	7.6	____
1,1,2-Trichloro-1,2,2-trifluoroethane	1.05	0.96	____
Trichlorethylene	0.062	0.091	____
Trichlorofluoromethane	0.05	0.96	____
Xylene	0.05	0.15	____

California List Prohibited Wastes	Level (mg/l)	Treatment Standard	
Halogenated Organic Compounds	1000.0	Incineration	____
Arsenic (As) Nonwastewaters	500.0	None	____
Mercury (Hg) Nonwastewaters	20.0	None	____
Nickel (Ni)	134.0	None	____
Thallium (Tl)	130.0	None	____
Chlorinated Biphenyls (PCB's)	50.0	Incineration	____

Waste Descriptions and/or Treatment Subcategory		Treatment Standards Reference in 40 CFR and Technology Codes for 40 CFR 268.42(a) Wastewaters		Nonwastewaters		Check All That Apply
Waste Code	Description					
D001:	Wastewaters (<1.0 wt% TOC and TSS)	268.42(a) DEACT	____	NA		
	Low TOC Ignitable Liquids (<10 wt% TOC)	NA		268.42(a) DEACT	____	
	High TOC Ignitable Liquids (>10 wt% TOC)	NA		268.42(a) RORGS, FSUBS, or INCIN	X	
D002	Corrosives, all subcategories & CA list	268.42(a) DEACT	____	268.42(a) DEACT	____	
D004	Arsenic (As)	268.43(a)	____	268.41(a)	____	Variance until 5-8-92
D005	Barium (Ba)	268.43(a)	X	268.41(a)	____	
D006	Cadmium (Cd)	268.43(a)	____	268.41(a)	____	
D007	Chromium (Cr)	268.43(a)	____	268.41(a)	____	
D008	Lead (Pb)	268.43(a)	X	268.41(a)	____	
D009:	Low Mercury Subcategory (<260 ppm Hg)	268.43(a)	____	268.41(a)	____	Variance until 5-8-92
	High Mercury Subcategory (>=260 ppm Hg)	268.43(a)	____	268.42(a) RMERC	____	Variance until 5-8-92
D010	Selenium (Se)	268.43(a)	____	268.41(a)	____	
D011	Silver (Ag)	268.43(a)	____	268.41(a)	____	
Other Codes	See attachment for supplemental list	-	____		____	

Generator Name: CERRO COPPER PRODUCTS CO. EPA ID: ILD080018914

Generator Representative Signature: Joe D Burroughs

Name & Title of Representative: JOE D. BURROUGHS, ENVIRON. ENGR.

Safety-Kleen Sample Number: 089922 Control Number: 0060298

Page

NOTICE OF LAND DISPOSAL RESTRICTION OF WASTE

HOLNAM

TO: SAFETY-KLEEN EPA ID NO: MOD029729688

HIGHWAY 79 NORTH

CLARKSVILLE MO 63336

Under manifest number 00006 line number 11a. (enter 11a, 11b, 11c, OR 11d) the Generator noted below is shipping to you a waste determined to be restricted under 40 CRF Part 268. In accordance with 40 CFR 268.7, the generator hereby provides notice that the waste is restricted and the EPA waste code and the appropriate treatment standards are as follows:

91

EPA Waste Codes: D008 F001, D005, D001

F001-F005 Spent Solvents	TREATMENT STANDARDS (mg/l) Wastewater w/Solvents	All Other Solvent Wastes	Check All That Apply
Regulated Hazardous Constituent			
Acetone	0.05	0.59	___
Benzene	0.07	3.7	___
n-Butyl alcohol	5.0	5.0	___
Carbon disulfide	1.05	4.81	___
Carbon tetrachloride	0.05	0.96	___
Chlorobenzene	0.15	0.05	___
Cresols (and cresylic acid)	2.82	0.75	___
Cyclohexanone	0.125	0.75	___
1,2-Dichlorobenzene	0.68	0.125	___
Ethyl acetate	0.05	0.75	___
Ethyl benzene	0.05	0.053	___
Ethyl ether	0.05	0.75	___
Isobutanol	5.0	5.0	___
Methanol	0.25	0.75	___
Methylene chloride	0.2	0.96	___
Methylene chloride(from Pharm. Industry)	0.44	0.96	___
Methyl ethyl ketone	0.05	0.75	___
Methyl isobutyl ketone	0.05	0.33	___
Nitrobenzene	0.65	0.125	___
Pyridine	1.12	0.33	___
Tetrachloroethylene	0.079	0.05	___
Toluene	1.12	0.33	___
1,1,1-Trichloroethane	1.05	0.41	X
1,1,2-Trichloroethane	0.03	7.6	___
1,1,2-Trichloro-1,2,2-trifluoroethane	1.05	0.96	___
Trichloroethylene	0.062	0.091	___
Trichlorofluoromethane	0.05	0.96	___
Xylene	0.05	0.15	___

California List Prohibited Wastes	Level (mg/l)	Treatment Standard	
Halogenated Organic Compounds	1000.0	Incineration	___
Arsenic (As) Nonwastewaters	500.0	None	___
Mercury (Hg) Nonwastewaters	20.0	None	___
Nickel (Ni)	134.0	None	___
Thallium (Tl)	130.0	None	___
Chlorinated Biphenyls (PCB's)	50.0	Incineration	___

Waste Descriptions and/or Treatment Subcategory		Treatment Standards Reference in 40 CFR and Technology Codes for 40 CFR 268.42(a) Wastewaters		Nonwastewaters		Check All That Apply
Waste Code	Description					
D001:	Wastewaters (<1.0 wt% TOC and TSS)	268.42(a) DEACT	___	NA		
	Low TOC Ignitable Liquids (<10 wt% TOC)	NA		268.42(a) DEACT	___	
	High TOC Ignitable Liquids (>10 wt% TOC)	NA		268.42(a) RORGS, FSUBS, or INCIN	X	
D002	Corrosives, all subcategories & CA list	268.42(a) DEACT	___	268.42(a) DEACT	___	
D004	Arsenic (As)	268.43(a)	___	268.41(a)	___	Variance until 5-8-92
D005	Barium (Ba)	268.43(a)	X	268.41(a)	___	
D006	Cadmium (Cd)	268.43(a)	___	268.41(a)	___	
D007	Chromium (Cr)	268.43(a)	___	268.41(a)	___	
D008	Lead (Pb)	268.43(a)	X	268.41(a)	___	
D009:	Low Mercury Subcategory (<260 ppm Hg)	268.43(a)	___	268.41(a)	___	Variance until 5-8-92
	High Mercury Subcategory (>=260 ppm Hg)	268.43(a)	___	268.42(a) RMERC	___	Variance until 5-8-92
D010	Selenium (Se)	268.43(a)	___	268.41(a)	___	
D011	Silver (Ag)	268.43(a)	___	268.41(a)	___	
Other Codes	See attachment for supplemental list		___		___	

Generator Name: CERRO COPPER PRODUCTS CO. EPA ID: ILD080018914

Generator Representative Signature: Joe D. Burroughs

Name & Title of Representative: JOE D. BURROUGHS, ENVIRON. ENGR.

Safety-Kleen Sample Number: 089922 Control Number: 0060298

NOTICE OF LAND DISPOSAL RESTRICTION OF WASTE

TO: HOLNAM / SAFETY-KLEEN
HIGHWAY 79 NORTH
CLARKSVILLE MO 63336

EPA ID NO: MOD029729688

Under manifest number D0070 line number 11a. (enter 11a, 11b, 11c, OR 11d) the Generator noted below is shipping to you a waste determined to be restricted under 40 CRF Part 268. In accordance with 40 CFR 268.7, the generator hereby provides notice that the waste is restricted and the EPA waste code and the appropriate treatment standards are as follows:

EPA Waste Codes: D008 F001 (D001, D005 pw)

F001-F005 Spent Solvents Regulated Hazardous Constituent	TREATMENT STANDARDS (mg/l) Wastewater w/Solvents	 All Other Solvent Wastes	Check All That Apply
Acetone	0.05	0.59	___
Benzene	0.07	3.7	___
n-Butyl alcohol	5.0	5.0	___
Carbon disulfide	1.05	4.81	___
Carbon tetrachloride	0.05	0.96	___
Chlorobenzene	0.15	0.05	___
Cresols (and cresylic acid)	2.82	0.75	___
Cyclohexanone	0.125	0.75	___
1,2-Dichlorobenzene	0.68	0.125	___
Ethyl acetate	0.05	0.75	___
Ethyl benzene	0.05	0.053	___
Ethyl ether	0.05	0.75	___
Isobutanol	5.0	5.0	___
Methanol	0.25	0.75	___
Methylene chloride	0.2	0.96	___
Methylene chloride(from Pharm. Industry)	0.44	0.96	___
Methyl ethyl ketone	0.05	0.75	___
Methyl isobutyl ketone	0.05	0.33	___
Nitrobenzene	0.65	0.125	___
Pyridine	1.12	0.33	___
Tetrachloroethylene	0.079	0.05	___
Toluene	1.12	0.33	___
1,1,1-Trichloroethane	1.05	0.41	X pw
1,1,2-Trichloroethane	0.03	7.6	___
1,1,2-Trichloro-1,2,2-trifluoroethane	1.05	0.96	___
Trichloroethylene	0.062	0.091	___
Trichlorofluoromethane	0.05	0.96	___
Xylene	0.05	0.15	___

California List Prohibited Wastes	Level (mg/l)	Treatment Standard	
Halogenated Organic Compounds	1000.0	Incineration	___
Arsenic (As) Nonwastewaters	500.0	None	___
Mercury (Hg) Nonwastewaters	20.0	None	___
Nickel (Ni)	134.0	None	___
Thallium (Tl)	130.0	None	___
Chlorinated Biphenyls (PCB's)	50.0	Incineration	___

Waste Descriptions and/or Treatment Subcategory Waste Code	Description	Treatment Standards Reference in 40 CFR and Technology Codes for 40 CFR 268.42(a) Wastewaters		Nonwastewaters		Check All That Apply
D001:	Wastewaters (<1.0 wt% TOC and TSS)	268.42(a) DEACT	___	NA		
	Low TOC Ignitable Liquids (<10 wt% TOC)	NA		268.42(a) DEACT	___	
	High TOC Ignitable Liquids (>10 wt% TOC)	NA		268.42(a) RORGS, FSUBS, or INCIN	X	
D002	Corrosives, all subcategories & CA list	268.42(a) DEACT	___	268.42(a) DEACT	___	
D004	Arsenic (As)	268.43(a)	___	268.41(a)	___	Variance until 5-8-92
D005	Barium (Ba)	268.43(a)	X	268.41(a)	___	
D006	Cadmium (Cd)	268.43(a)	___	268.41(a)	___	
D007	Chromium (Cr)	268.43(a)	___	268.41(a)	___	
D008	Lead (Pb)	268.43(a)	X	268.41(a)	___	
D009:	Low Mercury Subcategory (<260 ppm Hg)	268.43(a)	___	268.41(a)	___	Variance until 5-8-92
	High Mercury Subcategory (>=260 ppm Hg)	268.43(a)	___	268.42(a) RMERC	___	Variance until 5-8-92
D010	Selenium (Se)	268.43(a)	___	268.41(a)	___	
D011	Silver (Ag)	268.43(a)	___	268.41(a)	___	
Other Codes	See attachment for supplemental list		___		___	

Generator Name: CERRO COPPER PRODUCTS CO. EPA ID: ILD080018914

Generator Representative Signature: Joe D. Burroughs

Name & Title of Representative: JOE D. BURROUGHS, ENVIRON. ENGR.

Safety-Kleen Sample Number: 089922 Control Number: 0060298

NOTICE OF LAND DISPOSAL RESTRICTION OF WASTE

HOLNAM

TO: SAFETY-KLEEN EPA ID NO: MOD029729688

HIGHWAY 79 NORTH

CLARKSVILLE, MO 63336

Under manifest number D0012 line number 11a. (enter 11a, 11b, 11c, OR 11d) the Generator noted below is shipping to you a waste determined to be restricted under 40 CRF Part 268. In accordance with 40 CFR 268.7, the generator hereby provides notice that the waste is restricted and the EPA waste code and the appropriate treatment standards are as follows:

EPA Waste Codes: D008 F001, D001, D005 pw

F001-F005 Spent Solvents	TREATMENT STANDARDS (mg/l) Wastewater w/Solvents	All Other Solvent Wastes	Check All That Apply
Regulated Hazardous Constituent			
Acetone	0.05	0.59	
Benzene	0.07	3.7	
n-Butyl alconol	5.0	5.0	
Carbon disulfide	1.05	4.81	
Carbon tetrachloride	0.05	0.96	
Chlorobenzene	0.15	0.05	
Cresols (and cresylic acid)	2.82	0.75	
Cyclohexanone	0.125	0.75	
1,2-Dichlorobenzene	0.68	0.125	
Ethyl acetate	0.05	0.75	
Ethyl benzene	0.05	0.053	
Ethyl ether	0.05	0.75	
Isobutanol	5.0	5.0	
Methanol	0.25	0.75	
Methylene chloride	0.2	0.96	
Methylene chloride(from Pharm. Industry)	0.44	0.96	
Methyl ethyl ketone	0.05	0.75	
Methyl isobutyl ketone	0.05	0.33	
Nitrobenzene	0.65	0.125	
Pyridine	1.12	0.33	
Tetrachloroethylene	0.079	0.05	
Toluene	1.12	0.33	X pw
1,1,1-Trichloroethane	1.05	0.41	X pw
1,1,2-Trichloroethane	0.03	7.6	
1,1,2-Trichloro-1,2,2-trifluoroethane	1.05	0.96	
Trichloroethylene	0.062	0.091	
Trichlorofluoromethane	0.05	0.96	
Xylene	0.05	0.15	

California List Prohibited Wastes	Level (mg/l)	Treatment Standard	
Halogenated Organic Compounds	1000.0	Incineration	
Arsenic (As) Nonwastewaters	500.0	None	
Mercury (Hg) Nonwastewaters	20.0	None	
Nickel (Ni)	134.0	None	
Thallium (Tl)	130.0	None	
Chlorinated Biphenyls (PCB's)	50.0	Incineration	

Waste Descriptions and/or Treatment Subcategory		Treatment Standards Reference in 40 CFR and Technology Codes for 40 CFR 268.42(a) Wastewaters		Nonwastewaters		Check All That Apply
Waste Code	Description					
D001:	Wastewaters (<1.0 wt% TOC and TSS)	268.42(a) DEACT		NA		
	Low TOC Ignitable Liquids (<10 wt% TOC)	NA		268.42(a) DEACT		
	High TOC Ignitable Liquids (>10 wt% TOC)	NA		268.42(a) RORGS, FSUBS, or INCIN		X
D002	Corrosives, all subcategories & CA list	268.42(a) DEACT		268.42(a) DEACT		
D004	Arsenic (As)	268.43(a)		268.41(a)		Variance until 5-8-92
D005	Barium (Ba)	268.43(a)	X	268.41(a)		
D006	Cadmium (Cd)	268.43(a)		268.41(a)		
D007	Chromium (Cr)	268.43(a)		268.41(a)		
D008	Lead (Pb)	268.43(a)	X	268.41(a)		
D009:	Low Mercury Subcategory (<260 ppm Hg)	268.43(a)		268.41(a)		Variance until 5-8-92
	High Mercury Subcategory (>=260 ppm Hg)	268.43(a)		268.42(a) RMERC		Variance until 5-8-92
D010	Selenium (Se)	268.43(a)		268.41(a)		
D011	Silver (Ag)	268.43(a)		268.41(a)		
Other Codes	See attachment for supplemental list					

Generator Name: CERRO COPPER PRODUCTS CO. EPA ID: ILD080018914

Generator Representative Signature: John A. Burroughs

Name & Title of Representative: JOE D. BURROUGHS, ENVIRON. ENGR.

Safety-Kleen Sample Number: 089922 Control Number: 0060298

NOTICE OF LAND DISPOSAL RESTRICTION OF WASTE

911

TO: HOLNAM INC. / SAFETY KLEEN EPA ID NO: MOD 029729688
S.E. HWY 79 NORTH, P.O. BOX 452
CLARKSVILLE, MO 63336

Under manifest number 00015 line number 11a (enter 11a, 11b, 11c, OR 11d) the Generator noted below is shipping to you a waste determined to be restricted under 40 CRF Part 268. In accordance with 40 CFR 268.7, the generator hereby provides notice that the waste is restricted and the EPA waste code and the appropriate treatment standards are as follows:

EPA Waste Codes: D008 F001 D005 LP

F001-F005 Spent Solvents	TREATMENT STANDARDS (mg/l) Wastewater w/Solvents	All Other Solvent Wastes	Check All That Apply
Regulated Hazardous Constituent			
Acetone	0.05	0.59	
Benzene	0.07	3.7	
n-Butyl alcohol	5.0	5.0	
Carbon disulfide	1.05	4.81	
Carbon tetrachloride	0.05	0.96	
Chlorobenzene	0.15	0.05	
Cresols (and cresylic acid)	2.82	0.75	
Cyclohexanone	0.125	0.75	
1,2-Dichlorobenzene	0.68	0.125	
Ethyl acetate	0.05	0.75	
Ethyl benzene	0.05	0.053	
Ethyl ether	0.05	0.75	
Isobutanol	5.0	5.0	
Methanol	0.25	0.75	
Methylene chloride	0.2	0.96	
Methylene chloride(from Pharm. Industry)	0.44	0.96	
Methyl ethyl ketone	0.05	0.75	
Methyl isobutyl ketone	0.05	0.33	
Nitrobenzene	0.65	0.125	
Pyridine	1.12	0.33	
Tetrachloroethylene	0.079	0.05	
Toluene	1.12	0.33	
1,1,1-Trichloroethane	1.05	0.41	X LP
1,1,2-Trichloroethane	0.03	7.6	
1,1,2-Trichloro-1,2,2-trifluoroethane	1.05	0.96	
Trichloroethylene	0.062	0.091	
Trichlorofluoromethane	0.05	0.96	
Xylene	0.05	0.15	

California List Prohibited Wastes	Level (mg/l)	Treatment Standard	
Halogenated Organic Compounds	1000.0	Incineration	
Arsenic (As) Nonwastewaters	500.0	None	
Mercury (Hg) Nonwastewaters	20.0	None	
Nickel (Ni)	134.0	None	
Thallium (Tl)	130.0	None	
Chlorinated Biphenyls (PCB's)	50.0	Incineration	

Waste Descriptions and/or Treatment Subcategory		Treatment Standards Reference in 40 CFR and Technology Codes for 40 CFR 268.42(a)		Check All That Apply
Waste Code	Description	Wastewaters	Nonwastewaters	
D001:	Wastewaters (<1.0 wt% TOC and TSS)	268.42(a) DEACT	NA	LP
	Low TOC Ignitable Liquids (<10 wt% TOC)	NA	268.42(a) DEACT	X
	High TOC Ignitable Liquids (>10 wt% TOC)	NA	268.42(a) RORGS, FSUBS, or INCIN	X
D002	Corrosives, all subcategories & CA list	268.42(a) DEACT	268.42(a) DEACT	
D004	Arsenic (As)	268.43(a)	268.41(a)	Variance until 5-8-92
D005	Barium (Ba)	268.43(a)	268.41(a)	
D006	Cadmium (Cd)	268.43(a)	268.41(a)	
D007	Chromium (Cr)	268.43(a)	268.41(a)	
D008	Lead (Pb)	268.43(a)	268.41(a)	X
D009:	Low Mercury Subcategory (<260 ppm Hg)	268.43(a)	268.41(a)	Variance until 5-8-92
	High Mercury Subcategory (>=260 ppm Hg)	268.43(a)	268.42(a) RMERC	Variance until 5-8-92
D010	Selenium (Se)	268.43(a)	268.41(a)	
D011	Silver (Ag)	268.43(a)	268.41(a)	
Other Codes	See attachment for supplemental list			

Generator Name: Cerro Copper Product, Co. EPA ID: ILD080018914

Generator Representative Signature: Joe D. Burroughs

Name & Title of Representative: JOE D. BURROUGHS, ENVIRON. ENGR.

Safety-Kleen Sample Number: 079922 Control Number: 006029P-5

NOTICE OF LAND DISPOSAL RESTRICTION OF WASTE

91

AM

SAFETY-KLEEN EPA ID NO: MOD029729688

HIGHWAY 79 NORTH

CLARKSVILLE MO 63336

Under manifest number 00017 line number 11a. (enter 11a, 11b, 11c, OR 11d) the Generator noted below is shipping to you a waste determined to be restricted under 40 CRF Part 268. In accordance with 40 CFR 268.7, the generator hereby provides notice that the waste is restricted and the EPA waste code and the appropriate treatment standards are as follows:

EPA Waste Codes: D008 F001 ,D005 pw

F001-F005 Spent Solvents	TREATMENT STANDARDS (mg/l) Wastewater w/Solvents	All Other Solvent Wastes	Check All That Apply
Regulated Hazardous Constituent			
Acetone	0.05	0.59	____
Benzene	0.07	3.7	____
n-Butyl alcohol	5.0	5.0	____
Carbon disulfide	1.05	4.81	____
Carbon tetrachloride	0.05	0.96	____
Chlorobenzene	0.15	0.05	____
Cresols (and cresylic acid)	2.82	0.75	____
Cyclohexanone	0.125	0.75	____
1,2-Dichlorobenzene	0.68	0.125	____
Ethyl acetate	0.05	0.75	____
Ethyl benzene	0.05	0.053	____
Ethyl ether	0.05	0.75	____
Isobutanol	5.0	5.0	____
Methanol	0.25	0.75	____
Methylene chloride	0.2	0.96	____
Methylene chloride(from Pharm. Industry)	0.44	0.96	____
Methyl ethyl ketone	0.05	0.75	____
Methyl isobutyl ketone	0.05	0.33	____
Nitrobenzene	0.65	0.125	____
Pyridine	1.12	0.33	____
Tetrachloroethlyene	0.079	0.05	____
Toluene	1.12	0.33	____
1,1,1-Trichloroethane	1.05	0.41	____
1,1,2-Trichloroethane	0.03	7.6	____
1,1,2-Trichloro-1,2,2-trifluoroethane	1.05	0.96	____
Trichlorethylene	0.062	0.091	____
Trichlorofluoromethane	0.05	0.96	____
Xylene	0.05	0.15	____

California List Prohibited Wastes	Level (mg/l)	Treatment Standard	
Halogenated Organic Compounds	1000.0	Incineration	____
Arsenic (As) Nonwastewaters	500.0	None	____
Mercury (Hg) Nonwastewaters	20.0	None	____
Nickel (Ni)	134.0	None	____
Thallium (Tl)	130.0	None	____
Chlorinated Biphenyls (PCB's)	50.0	Incineration	____

Waste Descriptions and/or Treatment Subcategory		Treatment Standards Reference in 40 CFR and Technology Codes for 40 CFR 268.42(a)				Check All That Apply
Waste Code	Description	Wastewaters		Nonwastewaters		
D001:	Wastewaters (<1.0 wt% TOC and TSS)	268.42(a) DEACT	____	NA		
	Low TOC Ignitable Liquids (<10 wt% TOC)	NA		268.42(a) DEACT	____	
	High TOC Ignitable Liquids (>10 wt% TOC)	NA		268.42(a) RORGS, FSUBS, or INCIN	X	
D002	Corrosives, all subcategories & CA list	268.42(a) DEACT	____	268.42(a) DEACT	____	
D004	Arsenic (As)	268.43(a)	____	268.41(a)	____	Variance until 5-8-92
D005	Barium (Ba)	268.43(a)	X	268.41(a)	X	pw
D006	Cadmium (Cd)	268.43(a)	____	268.41(a)	____	
D007	Chromium (Cr)	268.43(a)	____	268.41(a)	____	
D008	Lead (Pb)	268.43(a)	X	268.41(a)	X	pw
D009:	Low Mercury Subcategory (<260 ppm Hg)	268.43(a)	____	268.41(a)	____	Variance until 5-8-92
	High Mercury Subcategory (>=260 ppm Hg)	268.43(a)	____	268.42(a) RMERC	____	Variance until 5-8-92
D010	Selenium (Se)	268.43(a)	____	268.41(a)	____	
D011	Silver (Ag)	268.43(a)	____	268.41(a)	____	
Other Codes	See attachment for supplemental list		____		____	

Generator Name: CERRO COPPER PRODUCTS CO. EPA ID: ILD080018914

Generator Representative Signature: Joe D. Burroughs

Name & Title of Representative: JOE D. BURROUGHS, ENVIRON. ENGR.

Safety-Kleen Sample Number: 089922 Control Number: 0060298

NOTICE OF LAND DISPOSAL RESTRICTION OF WASTE

AM

SAFETY-KLEEN EPA ID NO: MOD029729688

HIGHWAY 79 NORTH

CLARKSVILLE MO 63336

Under manifest number 00003 line number 11a. (enter 11a, 11b, 11c, OR 11d) the Generator noted below is shipping to you a waste determined to be restricted under 40 CRF Part 268. In accordance with 40 CFR 268.7, the generator hereby provides notice that the waste is restricted and the EPA waste code and the appropriate treatment standards are as follows:

EPA Waste Codes: D008 F001 D005 [illegible] D001 [illegible]

F001-F005 Spent Solvents Regulated Hazardous Constituent	TREATMENT STANDARDS (mg/l) Wastewater w/Solvents	All Other Solvent Wastes	Check All That Apply
Acetone	0.05	0.59	___
Benzene	0.07	3.7	___
n-Butyl alcohol	5.0	5.0	___
Carbon disulfide	1.05	4.81	___
Carbon tetrachloride	0.05	0.96	___
Chlorobenzene	0.15	0.05	___
Cresols (and cresylic acid)	2.82	0.75	___
Cyclohexanone	0.125	0.75	___
1,2-Dichlorobenzene	0.68	0.125	___
Ethyl acetate	0.05	0.75	___
Ethyl benzene	0.05	0.053	___
Ethyl ether	0.05	0.75	___
Isobutanol	5.0	5.0	___
Methanol	0.25	0.75	___
Methylene chloride	0.2	0.96	___
Methylene chloride(from Pharm. Industry)	0.44	0.96	___
Methyl ethyl ketone	0.05	0.75	___
Methyl isobutyl ketone	0.05	0.33	___
Nitrobenzene	0.65	0.125	___
Pyridine	1.12	0.33	___
Tetrachloroethlyene	0.079	0.05	___
Toluene	1.12	0.33	___
1,1,1-Trichloroethane	1.05	0.41	___
1,1,2-Trichloroethane	0.03	7.6	___
1,1,2-Trichloro-1,2,2-trifluoroethane	1.05	0.96	___
Trichlorethylene	0.062	0.091	___
Trichlorofluoromethane	0.05	0.96	___
Xylene	0.05	0.15	___

California List Prohibited Wastes	Level (mg/l)	Treatment Standard	
Halogenated Organic Compounds	1000.0	Incineration	___
Arsenic (As) Nonwastewaters	500.0	None	___
Mercury (Hg) Nonwastewaters	20.0	None	___
Nickel (Ni)	134.0	None	___
Thallium (Tl)	130.0	None	___
Chlorinated Biphenyls (PCB's)	50.0	Incineration	___

Waste Descriptions and/or Treatment Subcategory		Treatment Standards Reference in 40 CFR and Technology Codes for 40 CFR 268.42(a) Wastewaters		Nonwastewaters		Check All That Apply
Waste Code	Description					
D001:	Wastewaters (<1.0 wt% TOC and TSS)	268.42(a) DEACT	___	NA		
	Low TOC Ignitable Liquids (<10 wt% TOC)	NA		268.42(a) DEACT	___	
	High TOC Ignitable Liquids (>10 wt% TOC)	NA		268.42(a) RORGS, FSUBS, or INCIN	X	
D002	Corrosives, all subcategories & CA list	268.42(a) DEACT	___	268.42(a) DEACT	___	
D004	Arsenic (As)	268.43(a)	___	268.41(a)	___	Variance until 5-8-92
D005	Barium (Ba)	268.43(a)	X	268.41(a)	X	
D006	Cadmium (Cd)	268.43(a)	___	268.41(a)	___	
D007	Chromium (Cr)	268.43(a)	___	268.41(a)	___	
D008	Lead (Pb)	268.43(a)	X	268.41(a)	X	
D009:	Low Mercury Subcategory (<260 ppm Hg)	268.43(a)	___	268.41(a)	___	Variance until 5-8-92
	High Mercury Subcategory (>=260 ppm Hg)	268.43(a)	___	268.42(a) RMERC	___	Variance until 5-8-92
D010	Selenium (Se)	268.43(a)	___	268.41(a)	___	
D011	Silver (Ag)	268.43(a)	___	268.41(a)	___	
Other Codes	See attachment for supplemental list		___		___	

Generator Name: CERRO COPPER PRODUCTS CO. EPA ID: ILD080018914

Generator Representative Signature: Joe D. Burroughs

Name & Title of Representative: JOE D. BURROUGHS, ENVIRON. ENGR.

Safety-Kleen Sample Number: 089922 Control Number: 0060298

NOTICE OF LAND DISPOSAL RESTRICTION OF WASTE

TO: HOLNAM / SAFETY-KLEEN EPA ID NO: MOD029729688
HIGHWAY 79 NORTH
CLARKSVILLE, MO 63336

Under manifest number 00004 line number 11a. (enter 11a, 11b, 11c, OR 11d) the Generator noted below is shipping to you a waste determined to be restricted under 40 CRF Part 268. In accordance with 40 CFR 268.7, the generator hereby provides notice that the waste is restricted and the EPA waste code and the appropriate treatment standards are as follows:

EPA Waste Codes: D008 F001, D005 M, D001

F001-F005 Spent Solvents	TREATMENT STANDARDS (mg/l) Wastewater w/Solvents	All Other Solvent Wastes	Check All That Apply
Regulated Hazardous Constituent			
Acetone	0.05	0.59	___
Benzene	0.07	3.7	___
n-Butyl alcohol	5.0	5.0	___
Carbon disulfide	1.05	4.81	___
Carbon tetrachloride	0.05	0.96	___
Chlorobenzene	0.15	0.05	___
Cresols (and cresylic acid)	2.82	0.75	___
Cyclohexanone	0.125	0.75	___
1,2-Dichlorobenzene	0.68	0.125	___
Ethyl acetate	0.05	0.75	___
Ethyl benzene	0.05	0.053	___
Ethyl ether	0.05	0.75	___
Isobutanol	5.0	5.0	___
Methanol	0.25	0.75	___
Methylene chloride	0.2	0.96	___
Methylene chloride(from Pharm. Industry)	0.44	0.96	___
Methyl ethyl ketone	0.05	0.75	___
Methyl isobutyl ketone	0.05	0.33	___
Nitrobenzene	0.65	0.125	___
Pyridine	1.12	0.33	___
Tetrachloroethylene	0.079	0.05	___
Toluene	1.12	0.33	___
1,1,1-Trichloroethane	1.05	0.41	___
1,1,2-Trichloroethane	0.03	7.6	___
1,1,2-Trichloro-1,2,2-trifluoroethane	1.05	0.96	___
Trichloroethylene	0.062	0.091	___
Trichlorofluoromethane	0.05	0.96	___
Xylene	0.05	0.15	___

California List Prohibited Wastes	Level (mg/l)	Treatment Standard	
Halogenated Organic Compounds	1000.0	Incineration	X
Arsenic (As) Nonwastewaters	500.0	None	___
Mercury (Hg) Nonwastewaters	20.0	None	___
Nickel (Ni)	134.0	None	___
Thallium (Tl)	130.0	None	___
Chlorinated Biphenyls (PCB's)	50.0	Incineration	___

Waste Descriptions and/or Treatment Subcategory		Treatment Standards Reference in 40 CFR and Technology Codes for 40 CFR 268.42(a) Wastewaters		Nonwastewaters		Check All That Apply
Waste Code	Description					
D001:	Wastewaters (<1.0 wt% TOC and TSS)	268.42(a) DEACT	___	NA		
	Low TOC Ignitable Liquids (<10 wt% TOC)	NA		268.42(a) DEACT	___	
	High TOC Ignitable Liquids (>10 wt% TOC)	NA		268.42(a) RORGS, FSUBS, or INCIN	X	
D002	Corrosives, all subcategories & CA list	268.42(a) DEACT	___	268.42(a) DEACT	___	
D004	Arsenic (As)	268.43(a)	___	268.41(a)	___	Variance until 5-8-92
D005	Barium (Ba)	268.43(a)	[redacted]	268.41(a)	X	
D006	Cadmium (Cd)	268.43(a)	___	268.41(a)	___	
D007	Chromium (Cr)	268.43(a)	___	268.41(a)	___	
D008	Lead (Pb)	268.43(a)	[redacted]	268.41(a)	X	
D009:	Low Mercury Subcategory (<260 ppm Hg)	268.43(a)	___	268.41(a)	___	Variance until 5-8-92
	High Mercury Subcategory (>=260 ppm Hg)	268.43(a)	___	268.42(a) RMERC	___	Variance until 5-8-92
D010	Selenium (Se)	268.43(a)	___	268.41(a)	___	
D011	Silver (Ag)	268.43(a)	___	268.41(a)	___	
Other Codes	See attachment for supplemental list		___		___	

Generator Name: CERRO COPPER PRODUCTS CO. EPA ID: ILD080018914

Generator Representative Signature: [signature]

Name & Title of Representative: JOE D. BURROUGHS, ENVIRON. ENGR.

Safety-Kleen Sample Number: 089922 Control Number: 0060298

NOTICE OF LAND DISPOSAL RESTRICTION OF WASTE

TO: HOLNAM / SAFETY-KLEEN EPA ID NO: MOD029729688
HIGHWAY 79 NORTH
CLARKSVILLE MO 63336

Under manifest number 00006 line number 11a. (enter 11a, 11b, 11c, OR 11d) the Generator noted below is shipping to you a waste determined to be restricted under 40 CRF Part 268. In accordance with 40 CFR 268.7, the generator hereby provides notice that the waste is restricted and the EPA waste code and the appropriate treatment standards are as follows:

EPA Waste Codes: D008 F001, D001, D005

F001-F005 Spent Solvents	TREATMENT STANDARDS (mg/l) Wastewater w/Solvents	All Other Solvent Wastes	Check All That Apply
Regulated Hazardous Constituent			
Acetone	0.05	0.59	____
Benzene	0.07	3.7	____
n-Butyl alcohol	5.0	5.0	____
Carbon disulfide	1.05	4.81	____
Carbon tetrachloride	0.05	0.96	____
Chlorobenzene	0.15	0.05	____
Cresols (and cresylic acid)	2.82	0.75	____
Cyclonexanone	0.125	0.75	____
1,2-Dichlorobenzene	0.68	0.125	____
Ethyl acetate	0.05	0.75	____
Ethyl benzene	0.05	0.053	____
Ethyl ether	0.05	0.75	____
Isobutanol	5.0	5.0	____
Methanol	0.25	0.75	____
Methylene chloride	0.2	0.96	____
Methylene chloride(from Pharm. Industry)	0.44	0.96	____
Methyl ethyl ketone	0.05	0.75	____
Methyl isobutyl ketone	0.05	0.33	____
Nitrobenzene	0.65	0.125	____
Pyridine	1.12	0.33	____
Tetrachloroethlyene	0.079	0.05	____
Toluene	1.12	0.33	____
1,1,1-Trichloroethane	1.05	0.41	____
1,1,2-Trichloroethane	0.03	7.6	____
1,1,2-Trichloro-1,2,2-trifluoroethane	1.05	0.96	____
Trichlorethylene	0.062	0.091	____
Trichlorofluoromethane	0.05	0.96	____
Xylene	0.05	0.15	____

California List Prohibited Wastes	Level (mg/l)	Treatment Standard	
Halogenated Organic Compounds	1000.0	Incineration	____
Arsenic (As) Nonwastewaters	500.0	None	____
Mercury (Hg) Nonwastewaters	20.0	None	____
Nickel (Ni)	134.0	None	____
Thallium (Tl)	130.0	None	____
Chlorinated Biphenyls (PCB's)	50.0	Incineration	____

Waste Descriptions and/or Treatment Subcategory		Treatment Standards Reference in 40 CFR and Technology Codes for 40 CFR 268.42(a) Wastewaters		Nonwastewaters		Check All That Apply
Waste Code	Description					
D001:	Wastewaters (<1.0 wt% TOC and TSS)	268.42(a) DEACT	____	NA		
	Low TOC Ignitable Liquids (<10 wt% TOC)	NA		268.42(a) DEACT	____	
	High TOC Ignitable Liquids (>10 wt% TOC)	NA		268.42(a) RORGS, FSUBS, or INCIN	X	
D002	Corrosives, all subcategories & CA list	268.42(a) DEACT	____	268.42(a) DEACT	____	
D004	Arsenic (As)	268.43(a)	____	268.41(a)	____	Variance until 5-8-92
D005	Barium (Ba)	268.43(a)	X	268.41(a)	X	LP
D006	Cadmium (Cd)	268.43(a)	____	268.41(a)	____	
D007	Chromium (Cr)	268.43(a)	____	268.41(a)	____	
D008	Lead (Pb)	268.43(a)	X	268.41(a)	X	LP
D009:	Low Mercury Subcategory (<260 ppm Hg)	268.43(a)	____	268.41(a)	____	Variance until 5-8-92
	High Mercury Subcategory (>=260 ppm Hg)	268.43(a)	____	268.42(a) RMERC	____	Variance until 5-8-92
D010	Selenium (Se)	268.43(a)	____	268.41(a)	____	
D011	Silver (Ag)	268.43(a)	____	268.41(a)	____	
Other Codes	See attachment for supplemental list		____		____	

Generator Name: CERRO COPPER PRODUCTS CO. EPA ID: ILD080018914

Generator Representative Signature: Joe D. Burroughs

Name & Title of Representative: JOE D. BURROUGHS, ENVIRON. ENGR.

Safety-Kleen Sample Number: 089922 Control Number: 0060298

CERRO COPPER PRODUCTS CO.
P.O. Box 66800
St. Louis, MO 63166-6800
618/337-6000

October 20, 1992

Mr. Charles Harbaugh
Clayton Chemical Co.
#1 Mobile Avenue
Sauget, Illinois 62206

Dear Charlie:

A RCRA Inspection by Illinois E.P.A. on this date pointed out a discrepancy which we need your help to correct. For a period of time after the Land Ban sheets were required to be sent with the manifest we failed to copy those sheets for our files. Would you please, at your convenience, photocopy the Land Ban sheets accompanying the following manifested shipments to your facility. We are very appreciative of the services you have provided in the past and will be grateful for your assistance in this matter.

Shipment Date	Manifest Number	Illinois Manifest Number
February 27, 1991	✓001	IL4082142
March 6, 1991	✓002	IL4082145
June 13, 1991	✓003	IL4082147
June 18, 1991	✓004	IL4082148
July 10, 1991	✓00005	IL4466951
August 14, 1991	✓00001(?)	IL4466954
September 20, 1991	✓00006	IL4466961
October 15, 1991	✓007	IL4466967
October 22, 1991	✓00008	IL4466971
December 20, 1991	✓00009	IL4466975
October 15, 1992	✓00009	IL3921022

Again, your assistance will be appreciated.

Very truly yours,

CERRO COPPER PRODUCTS CO.

Joe D. Burroughs
Environmental Engineer

cc. J. M. Grana

GENERATOR NOTIFICATION
TO CLAYTON CHEMICAL CO.
REGARDING SHIPMENT OF WASTES
RESTRICTED FRO LAND DISPOSAL
UNDER 40 CFR 268.7(a)(1)

This notification is submitted by Cerro Copper Products Co. to Clayton Chemical in accordance with the Land Disposal Restrictions, Final Rule (effective Nov. 8, 1986) under 40 CFR 268.7 (a)(1). According to this final rule, generators of EPA Hazardous Waste Numbers F001 to F005 must provide the following information with each shipment delivered to CLAYTON CHEMICAL:

1. EPA Hazardous Waste Number(s): ~~F 001~~ F002

2. Manifest number associated with this shipment: 001 - 1C4082142

3. Waste analysis data (attach if different from Clayton's qualification analysis).

CORRESPONDING TREATMENT STANDARD

Instructions: For each solvent waste constituent present in this waste or its extract, check the appropriate box in front of the treatment standard(s) which apply or see item #4 below.

Solvent Constituent		(mg/liter) All other spent solvent wastes
Acetone		0.59
n-Butyl alconol		5.0
Carbon disulfide		4.81
Carbon tetrachloride		0.96
Chlorobenzene		0.05
Cresols and cresylic acid		0.75
Cyclohexanone		0.75
1,2-Dichlorobenzene		0.125
Ethyl acetate		0.75
Ethyl benzene		0.053
Ethyl ether		0.75
Isobutanol		5.0
Methanol		0.75
Methylene chloride		0.96
Methylene chloride (from the pharamaceutical industry)		0.96
Methyl ethyl ketone		0.75
Methyl isobutyl ketone		0.33
Nitrobenzene		0.125
Pyridine		0.33
Tetrachloroethylene		0.05
Toluene		0.33
1,1,1-Trichloroethane	X	0.41
1,1,2-Trichloroethane		0.96
Trichloroethylene		0.091
Trichlorofluromethane		0.96
Xylene		0.15

4. X This waste is restricted from land disposal based on knowledge of the waste, (check if applicable).

GENERATOR NOTIFICATION
TO CLAYTON CHEMICAL CO.
REGARDING SHIPMENT OF WASTES
RESTRICTED FRO LAND DISPOSAL
UNDER 40 CFR 268.7(a)(1)

This notification is submitted by Cerro Copper Products Co. to Clayton Chemical in accordance with the Land Disposal Restrictions, Final Rule (effective Nov. 8, 1986) under 40 CFR 268.7 (a)(1). According to this final rule, generators of EPA Hazardous Waste Numbers F001 to F005 must provide the following information with each shipment delivered to CLAYTON CHEMICAL:

1. EPA Hazardous Waste Number(s): ~~F001~~ F002

2. Manifest number associated with this shipment: IL 4082145

3. Waste analysis data (attach if different from Clayton's qualification analysis).

CORRESPONDING TREATMENT STANDARD

Instructions: For each solvent waste constituent present in this waste or its extract, check the appropriate box in front of the treatment standard(s) which apply or see item #4 below.

Solvent Constituent		(mg/liter) All other spent solvent wastes
Acetone		0.59
n-Butyl alconol		5.0
Carbon disulfide		4.81
Carbon tetrachloride		0.96
Chlorobenzene		0.05
Cresols and cresylic acid		0.75
Cyclohexanone		0.75
1,2-Dichlorobenzene		0.125
Ethyl acetate		0.75
Ethyl benzene		0.053
Ethyl ether		0.75
Isobutanol		5.0
Methanol		0.75
Methylene chloride		0.96
Methylene chloride (from the pharamaceutical industry)		0.96
Methyl ethyl ketone		0.75
Methyl isoobutyl ketone		0.33
Nitrobenzene		0.125
Pyridine		0.33
Tetrachloroethylene		0.05
Toluene		0.33
1,1,1-Trichloroethane	X	0.41
1,1,2-Trichloroethane		0.96
Trichloroethylene		0.091
Trichlorofluromethane		0.96
Xylene		0.15

4. X This waste is restricted from land disposal based on knowledge of the waste, (check if applicable).

GENERATOR NOTIFICATION
TO CLAYTON CHEMICAL CO.
REGARDING SHIPMENT OF WASTES
RESTRICTED FRO LAND DISPOSAL
UNDER 40 CFR 268.7(a)(1)

This notification is submitted by Cerro Copper Products Co. to Clayton Chemical in accordance with the Land Disposal Restrictions, Final Rule (effective Nov. 8, 1986) under 40 CFR 268.7 (a)(1). According to this final rule, generators of EPA Hazardous Waste Numbers F001 to F005 must provide the following information with each shipment delivered to CLAYTON CHEMICAL:

1. EPA Hazardous Waste Number(s): ~~F001~~ F002

2. Manifest number associated with this shipment: IL4082147

3. Waste analysis data (attach if different from Clayton's qualification analysis).

CORRESPONDING TREATMENT STANDARD

Instructions: For each solvent waste constituent present in this waste or its extract, check the appropriate box in front of the treatment standard(s) which apply or see item #4 below.

Solvent Constituent		(mg/liter) All other spent solvent wastes
Acetone		0.59
n-Butyl alcohol		5.0
Carbon disulfide		4.81
Carbon tetrachloride		0.96
Chlorobenzene		0.05
Cresols and cresylic acid		0.75
Cyclohexanone		0.75
1,2-Dichlorobenzene		0.125
Ethyl acetate		0.75
Ethyl benzene		0.053
Ethyl ether		0.75
Isobutanol		5.0
Methanol		0.75
Methylene chloride		0.96
Methylene chloride (from the pharamaceutical industry)		0.96
Methyl ethyl ketone		0.75
Methyl isobutyl ketone		0.33
Nitrobenzene		0.125
Pyridine		0.33
Tetrachloroethylene		0.05
Toluene		0.33
1,1,1-Trichloroethane		0.41
1,1,2-Trichloroethane		0.96
Trichloroethylene		0.091
Trichlorofluromethane		0.96
Xylene		0.15

4. X This waste is restricted from land disposal based on knowledge of the waste, (check if applicable).

GENERATOR NOTIFICATION,
TO CLAYTON CHEMICAL CO.
REGARDING SHIPMENT OF WASTES
RESTRICTED FRO LAND DISPOSAL
UNDER 40 CFR 268.7(a)(1)

This notification is submitted by Cerro Copper Products Co. to Clayton Chemical in accordance with the Land Disposal Restrictions, Final Rule (effective Nov. 8, 1986) under 40 CFR 268.7 (a)(1). According to this final rule, generators of EPA Hazardous Waste Numbers F001 to F005 must provide the following information with each shipment delivered to CLAYTON CHEMICAL:

1. EPA Hazardous Waste Number(s): F002

2. Manifest number associated with this shipment: 004 - IL4082148

3. Waste analysis data (attach if different from Clayton's qualification analysis).

CORRESPONDING TREATMENT STANDARD

Instructions: For each solvent waste constituent present in this waste or its extract, check the appropriate box in front of the treatment standard(s) which apply or see item #4 below.

Solvent Constituent		(mg/liter) All other spent solvent wastes
Acetone		0.59
n-Butyl alcohol		5.0
Carbon disulfide		4.81
Carbon tetrachloride		0.96
Chlorobenzene		0.05
Cresols and cresylic acid		0.75
Cyclohexanone		0.75
1,2-Dichlorobenzene		0.125
Ethyl acetate		0.75
Ethyl benzene		0.053
Ethyl ether		0.75
Isobutanol		5.0
Methanol		0.75
Methylene chloride		0.96
Methylene chloride (from the pharamaceutical industry)		0.96
Methyl ethyl ketone		0.75
Methyl isobutyl ketone		0.33
Nitrobenzene		0.125
Pyridine		0.33
Tetrachloroethylene		0.05
Toluene		0.33
1,1,1-Trichloroethane		0.41
1,1,2-Trichloroethane		0.96
Trichloroethylene		0.091
Trichlorofluromethane		0.96
Xylene		0.15

4. X This waste is restricted from land disposal based on knowledge of the waste, (check if applicable).

GENERATOR NOTIFICATION
TO CLAYTON CHEMICAL CO.
REGARDING SHIPMENT OF WASTES
RESTRICTED FRO LAND. DISPOSAL
UNDER 40 CFR 268.7(a)(1)

This notification is submitted by Cerro Copper Products Co. to Clayton Chemical in accordance with the Land Disposal Restrictions, Final Rule (effective Nov. 8, 1986) under 40 CFR 268.7 (a)(1). According to this final rule, generators of EPA Hazardous Waste Numbers F001 to F005 must provide the following information with each shipment delivered to CLAYTON CHEMICAL:

1. EPA Hazardous Waste Number(s): F001

2. Manifest number associated with this shipment: 0005 (IL 4466951)

3. Waste analysis data (attach if different from Clayton's qualification analysis).

CORRESPONDING TREATMENT STANDARD

Instructions: For each solvent waste constituent present in this waste or its extract, check the appropriate box in front of the treatment standard(s) which apply or see item #4 below.

Solvent Constituent		(mg/liter) All other spent solvent wastes
Acetone		0.59
n-Butyl alcohol		5.0
Carbon disulfide		4.81
Carbon tetrachloride		0.96
Chlorobenzene		0.05
Cresols and cresylic acid		0.75
Cyclohexanone		0.75
1,2-Dichlorobenzene		0.125
Ethyl acetate		0.75
Ethyl benzene		0.053
Ethyl ether		0.75
Isobutanol		5.0
Methanol		0.75
Methylene chloride		0.96
Methylene chloride (from the pharamaceutical industry)		0.96
Methyl ethyl ketone		0.75
Methyl isobutyl ketone		0.33
Nitrobenzene		0.125
Pyridine		0.33
Tetrachloroethylene		0.05
Toluene		0.33
1,1,1-Trichloroethane		0.41
1,1,2-Trichloroethane		0.96
Trichloroethylene		0.091
Trichlorofluromethane		0.96
Xylene		0.15

4. X This waste is restricted from land disposal based on knowledge of the waste, (check if applicable).

GENERATOR NOTIFICATION
TO CLAYTON CHEMICAL CO.
REGARDING SHIPMENT OF WASTES
RESTRICTED FRO LAND DISPOSAL
UNDER 40 CFR 268.7(a)(1)

This notification is submitted by Cerro Copper Products Co. to Clayton Chemical in accordance with the Land Disposal Restrictions, Final Rule (effective Nov. 8, 1986) under 40 CFR 268.7 (a)(1). According to this final rule, generators of EPA Hazardous Waste Numbers F001 to F005 must provide the following information with each shipment delivered to CLAYTON CHEMICAL:

1. EPA Hazardous Waste Number(s): F001

2. Manifest number associated with this shipment: IL 4466954-0000/

3. Waste analysis data (attach if different from Clayton's qualification analysis).

CORRESPONDING TREATMENT STANDARD

Instructions: For each solvent waste constituent present in this waste or its extract, check the appropriate box in front of the treatment standard(s) which apply or see item #4 below.

Solvent Constituent		(mg/liter) All other spent solvent wastes
Acetone		0.59
n-Butyl alconol		5.0
Carbon disulfide		4.81
Carbon tetrachloride		0.96
Chlorobenzene		0.05
Cresols and cresylic acid		0.75
Cyclonexanone		0.75
1,2-Dichlorobenzene		0.125
Ethyl acetate		0.75
Ethyl benzene		0.053
Ethyl ether		0.75
Isobutanol		5.0
Methanol		0.75
Methylene chloride		0.96
Methylene chloride (from the pharamaceutical industry)		0.96
Methyl ethyl ketone		0.75
Methyl isobutyl ketone		0.33
Nitrobenzene		0.125
Pyridine		0.33
Tetrachloroethylene		0.05
Toluene		0.33
1,1,1-Trichloroethane		0.41
1,1,2-Trichloroethane		0.96
Trichloroethylene		0.091
Trichlorofluromethane		0.96
Xylene		0.15

4. X This waste is restricted from land disposal based on knowledge of the waste, (check if applicable).

GENERATOR NOTIFICATION
TO CLAYTON CHEMICAL CO.
REGARDING SHIPMENT OF WASTES
RESTRICTED FRO LAND DISPOSAL
UNDER 40 CFR 268.7(a)(1)

This notification is submitted by Cerro Copper Products Co. to Clayton Chemical in accordance with the Land Disposal Restrictions, Final Rule (effective Nov. 8, 1986) under 40 CFR 268.7 (a)(1). According to this final rule, generators of EPA Hazardous Waste Numbers F001 to F005 must provide the following information with each shipment delivered to CLAYTON CHEMICAL:

1. EPA Hazardous Waste Number(s): F002

2. Manifest number associated with this shipment: IL4466941 00006

3. Waste analysis data (attach if different from Clayton's qualification analysis).

CORRESPONDING TREATMENT STANDARD

Instructions: For each solvent waste constituent present in this waste or its extract, check the appropriate box in front of the treatment standard(s) which apply or see item #4 below.

Solvent Constituent		(mg/liter) All other spent solvent wastes
Acetone		0.59
n-Butyl alconol		5.0
Carbon disulfide		4.81
Carbon tetrachloride		0.96
Chlorobenzene		0.05
Cresols and cresylic acid		0.75
Cyclonexanone		0.75
1,2-Dichlorobenzene		0.125
Ethyl acetate		0.75
Ethyl benzene		0.053
Ethyl ether		0.75
Isobutanol		5.0
Methanol		0.75
Methylene chloride		0.96
Methylene chloride (from the pharamaceutical industry)		0.96
Methyl ethyl ketone		0.75
Methyl isobutyl ketone		0.33
Nitrobenzene		0.125
Pyridine		0.33
Tetrachloroethylene		0.05
Toluene		0.33
1,1,1-Trichloroethane		0.41
1,1,2-Trichloroethane		0.96
Trichloroethylene		0.091
Trichlorofluromethane		0.96
Xylene		0.15

4. X This waste is restricted from land disposal based on knowledge of the waste, (check if applicable).

GENERATOR NOTIFICATION
TO CLAYTON CHEMICAL CO.
REGARDING SHIPMENT OF WASTES
RESTRICTED FRO LAND DISPOSAL
UNDER 40 CFR 268.7(a)(1)

This notification is submitted by Cerro Copper Products to Clayton Chemical in accordance with the Land Disposal Restrictions Final Rule (effective Nov. 8, 1986) under 40 CFR 268.7 (a)(1). According to this final rule, generators of EPA Hazardous Waste Numbers F001 to F005 must provide the following information with each shipment delivered to CLAYTON CHEMICAL:

1. EPA Hazardous Waste Number(s): F002

2. Manifest number associated with this shipment: IL 4466967

3. Waste analysis data (attach if different from Clayton's qualification analysis).

CORRESPONDING TREATMENT STANDARD

Instructions: For each solvent waste constituent present in this waste or its extract, check the appropriate box in front of the treatment standard(s) which apply or see item #4 below.

Solvent Constituent		(mg/liter) All other spent solvent wastes
Acetone		0.59
n-Butyl alconol		5.0
Carbon disulfide		4.81
Carbon tetracnloride		0.96
Chlorobenzene		0.05
Cresols and cresylic acid		0.75
Cyclohexanone		0.75
1,2-Dichlorobenzene		0.125
Ethyl acetate		0.75
Ethyl benzene		0.053
Ethyl ether		0.75
Isobutanol		5.0
Methanol		0.75
Methylene chloride		0.96
Methylene chloride (from the pharamaceutical industry)		0.96
Methyl ethyl ketone		0.75
Methyl isobutyl ketone		0.33
Nitrobenzene		0.125
Pyridine		0.33
Tetrachloroethylene		0.05
Toluene		0.33
1,1,1-Trichloroethane	X	0.41
1,1,2-Trichloroethane		0.96
Trichloroethylene		0.091
Trichlorofluromethane		0.96
Xylene		0.15

4. X This waste is restricted from land disposal based on knowledge of the waste, (check if applicable).

Jos. D. Brumfield

GENERATOR NOTIFICATION
TO CLAYTON CHEMICAL CO.
REGARDING SHIPMENT OF WASTES
RESTRICTED FRO LAND DISPOSAL
UNDER 40 CFR 268.7(a)(1)

[redacted] notification is submitted by Cerro Copper [redacted] Chemical in accordance with the Land Disposal Restrict[redacted] Rule (effective Nov. 8, 1986) under 40 CFR 268.7 (a)(1). As [redacted] this final rule, generators of EPA Hazardous Waste Numbers F001 to [redacted] must provide the following information with each shipment delivered to CLAYTON CHEMICAL:

1. EPA Hazardous Waste Number(s): F002

2. Manifest number associated with this shipment: #44669711

3. Waste analysis data (attach if different from Clayton's qualification analysis).

CORRESPONDING TREATMENT STANDARD

Instructions: For each solvent waste constituent present in this waste or its extract, check the appropriate box in front of the treatment standard(s) which apply or see item #4 below.

Solvent Constituent		(mg/liter) All other spent solvent wastes
Acetone		0.59
n-Butyl alcohol		5.0
Carbon disulfide		4.81
Carbon tetrachloride		0.96
Chlorobenzene		0.05
Cresols and cresylic acid		0.75
Cyclohexanone		0.75
1,2-Dichlorobenzene		0.125
Ethyl acetate		0.75
Ethyl benzene		0.053
Ethyl ether		0.75
Isobutanol		5.0
Methanol		0.75
Methylene chloride		0.96
Methylene chloride (from the pharamaceutical industry)		0.96
Methyl ethyl ketone		0.75
Methyl isobutyl ketone		0.33
Nitrobenzene		0.125
Pyridine		0.33
Tetrachloroethylene		0.05
Toluene		0.33
1,1,1-Trichloroethane		0.41
1,1,2-Trichloroethane		0.96
Trichloroethylene		0.091
Trichlorofluoromethane		0.96
Xylene		0.15

4. ____ This waste is restricted from land disposal based on knowledge of the waste, (check if applicable).

GENERATOR NOTIFICATION
TO CLAYTON CHEMICAL CO.
REGARDING SHIPMENT OF WASTES
RESTRICTED FRO LAND DISPOSAL
UNDER 40 CFR 268.7(a)(1)

This notification is submitted by Cerro Copper Products Co. to Clayton Chemical in accordance with the Land Disposal Restrictions, Final Rule (effective Nov. 8, 1986) under 40 CFR 268.7 (a)(1). According to this final rule, generators of EPA Hazardous Waste Numbers F001 to F005 must provide the following information with each shipment delivered to CLAYTON CHEMICAL:

1. EPA Hazardous Waste Number(s): F002

2. Manifest number associated with this shipment: 00009 IL4466975

3. Waste analysis data (attach if different from Clayton's qualification analysis).

CORRESPONDING TREATMENT STANDARD

Instructions: For each solvent waste constituent present in this waste or its extract, check the appropriate box in front of the treatment standard(s) which apply or see item #4 below.

Solvent Constituent		(mg/liter) All other spent solvent wastes
Acetone		0.59
n-Butyl alcohol		5.0
Carbon disulfide		4.81
Carbon tetrachloride		0.96
Chlorobenzene		0.05
Cresols and cresylic acid		0.75
Cyclonexanone		0.75
1,2-Dichlorobenzene		0.125
Ethyl acetate		0.75
Ethyl benzene		0.053
Ethyl ether		0.75
Isobutanol		5.0
Methanol		0.75
Methylene chloride		0.96
Methylene chloride (from the pharamaceutical industry)		0.96
Methyl ethyl ketone		0.75
Methyl isobutyl ketone		0.33
Nitrobenzene		0.125
Pyridine		0.33
Tetrachloroethylene		0.05
Toluene		0.33
1,1,1-Trichloroethane	X	0.41
1,1,2-Trichloroethane		0.96
Trichloroethylene		0.091
Trichlorofluromethane		0.96
Xylene		0.15

4. X This waste is restricted from land disposal based on knowledge of the waste, (check if applicable).

12/20/91

Clayton Chemical Company

Generator's Notification of Land Disposal Restrictions

CERCLA (Superfund) Hazardous Substance: CCC No.

Hazardous Waste: Yes No Line: 11A 11B

The waste described above is restricted from land disposal under 40 CFR 268 or RCRA Section 3004(d) as identified below. (Check all that apply)

☒ This shipment includes F001-F005 spent solvents, as identified on the reverse of this form. Check the hazardous waste number(s) that applies and circle or otherwise identify individual constituents likely to be present in the waste. See 40 CFR 268.41 and 268.42.

☐ This shipment includes F039 multi source leachate, as identified on the attached sheets(s). If this box is checked, a list of individual hazardous constituents expected to be present in the waste, along with applicable standards. See 40 CFR 268.43(a).

☐ This shipment includes RCRA Section 3004(d) California List wastes, as indentified on the attached sheet. If this box is checked, indicate individual constituents likely to be present.

☐ This shipment includes additional wastes identified below:

Hazardous Waste No.	Subcategory	Treatability Group 1	CFR Treatment Std. Reference 2	Treatment Standard 3
☐ D001	High TOC	Nonwastewater	268.42 Table 2	FSUBS,RORGS,IN
☐ D002	Acid (pH < 2.0)	Nonwastewater	268.42 Table 2	DEACT
☐ D002	Alkaline (pH > 12.5)	Nonwastewater	268.42 Table 2	DEACT
☐ D004		Nonwastewater	268.41 (a)	5.0 mg/L
☐ D006		Nonwastewater	268.41 (a)	1.0 mg/L
☐ D007		Nonwastewater	268.41 (a)	5.0 mg/L
☐ D008		Nonwastewater	268.41 (a)	5.0 mg/L
☐ D009	Low mercury (<260 mg/kg)	Nonwastewater	268.41 (a)	0.2 mg/l
☐ D010		Nonwastewater	268.41 (a)	1.0 mg/L
☐ D011		Nonwastewater	268.41 (a)	5.0 mg/L
☐ D035		Nonwastewater	268.41 (a)	200 mg/L
☐				
☐				
☐				

1 Treatability group is either "wastewater" or "nonwastewater".

2 To find the CFR reference for the treatment standard, look up the waste in 268.41(a) - Table CCWE:268.42(a)(1), (a)(2), (c), and Tables 2 and #; and 268.43(a) - Table CCW. The Reference must include both the section and paragraph where the treatment standard is found, e.g.268.42(a).

3 Wherever the CFR reference is 268.42, a five letter code (e.g. INCIN) must be included.

I certify under penalty of law that I am personally familiar with the above waste through testing and analysis, or through knowledge of the waste, and the information I have supplied on this certification is true and complete to the best of my knowledge.

Signed: Joe D. Burroughs Date: 10/15/92

Name: Joe D. Burroughs Title: Environmental Engineer

TREATMENT STANDARDS FOR F001-F005 SPENT SOLVENTS

[illegible] Check box for each applicable category and circle or otherwise identify individual constituents likely to be present in waste.

[illegible]	Constituent of Concern	NONWASTEWATER: Total Composition mg/kg	NONWASTEWATER: TCLP [illegible]	[illegible] mg/L
☐ [illegible] halogenated solvents in degreasing	Carbon tetrachloride		0.96	0.20
	Methylene chloride		0.96	0.20
	Tetrachloroethylene		0.05	0.079
	1,1,1-Trichloroethane		0.41	1.05
	Trichloroethylene		0.091	0.062
	1,1,2-Trichloro-1,2,2-trifluoroethane		0.96	1.05
	Trichlorofluoromethane		0.96	0.05
☒ **F002** - Spent halogenated solvents	Chlorobenzene		0.05	0.15
	1,2-Dichlorobenzene		0.125	0.65
	Methylene chloride		0.96	0.20
	Methylene chloride (from the pharmaceutical industry)		—	0.44
	Tetrachloroethylene	30 To 60%	0.05	0.079
	1,1,1-Trichloroethane	7.6	0.41	1.05
	1,1,2-Trichloroethane			0.030
	Trichloroethylene		0.091	0.062
	1,1,2-Trichloro-1,2,2-trifluoroethane		0.96	1.05
	Trichlorofluoromethane		0.96	0.05
☐ **F003** - Spent non-halogenated solvents	Acetone		0.59	0.05
	n-Butyl alcohol		5.0	5.0
	Cyclohexanone		0.75	0.125
	Ethyl acetate		0.75	0.05
	Ethyl benzene		0.053	0.05
	Ethyl ether		0.75	0.05
	Methanol		0.75	0.25
	Methyl isobutyl ketone		0.33	0.05
	Xylene		0.15	0.05
☐ **F004** - Spent non-halogenated solvents	Cresols (and cresylic acid)		0.75	2.82
	Nitrobenzene		0.125	0.66
☐ **F005** - Spent non-halogenated solvents	Benzene	3.7		0.070
	Carbon disulfide		4.81	1.05
	2-Ethoxyethanol	Incineration [1]		Biological degradation or incineration [2]
	Isobutanol		5.0	5.0
	Methyl ethyl ketone		0.75	0.05
	2-Nitropropane	Incineration [1]		(Wet oxidation or chemical oxidation) followed by carbon absorption; or incineration [3]
	Pyridine		0.33	1.12
	Toluene		0.33	1.12

1 Five-letter code is "INCIN".

2 Five-letter codes are "BIODG" or "INCIN".

3 Five letter codes are "(WETOX OR CHOXD)" fb "CARBN" or "INCIN".

CERRO COPPER PRODUCTS CO.
P.O. Box 66800
St. Louis, MO 63166-6800
618/337-6000

October 20, 1992

Safety-Kleen Envirosystems
State Highway 146
New Castle, Kentucky 40050

Customer Service Representative:

A RCRA Inspection by Illinois E.P.A. on this date pointed out a discrepancy which we need your help to correct. For a period of time after the Land Ban sheets were required to be sent with the manifest we failed to copy those sheets for our files. Would you please, at your convenience, photocopy the Land Ban sheets accompanying the following manifested shipments to your facility. We are very appreciative of the services you have provided in the past and will be grateful for your assistance in this matter.

Shipment Date	Manifest Number	Illinois Manifest Number
March 19, 1991	00001	IL4082146
May 28, 1991	00007	IL4467000
June 27, 1991	00008	IL4082149
July 1, 1991	00009	IL4082150
August 5, 1991	00011	IL4466952
September 27, 1991	00013	IL4466962
October 17, 1991	00014	IL4466968

Again, your assistance will be appreciated.

Very truly yours,

CERRO COPPER PRODUCTS CO.

Joe D. Burroughs
Environmental Engineer

cc. J. M. Grana

NOTICE OF LAND DISPOSAL RESTRICTION OF WASTE

TO: SAFETY-KLEEN CORP EPA ID NO: KYD053248106

STATE HWY 146

NEW CASTLE KY 40050

Under manifest number 1EC6248 line number 11A, (enter 11a, 11b, 11c, OR 11d) the Generator noted below is providing to you a waste determined to be restricted under 40 CRF Part 268. In accordance with 40 CFR 268.7, the generator hereby provides notice that the waste is restricted and the EPA waste code and the appropriate treatment standards are as follows:

EPA Waste Codes: D001

F001-F005 Spent Solvents	TREATMENT STANDARDS (mg/l) Wastewater w/Solvents	All Other Solvent Wastes	Check All That Apply
Regulated Hazardous Constituent			
Acetone	0.05	0.59	____
Benzene	0.07	3.7	____
n-Butyl alcohol	5.0	5.0	____
Carbon disulfide	1.05	4.81	____
Carbon tetrachloride	0.05	0.96	____
Chlorobenzene	0.15	0.05	____
Cresols (and cresylic acid)	2.82	0.75	____
Cyclohexanone	0.125	0.75	____
1,2-Dichlorobenzene	0.62	0.125	____
Ethyl acetate	0.05	0.75	____
Ethyl benzene	0.05	0.053	____
Ethyl ether	0.05	0.75	____
Isobutanol	5.0	5.0	____
Methanol	0.25	0.75	____
Methylene chloride	0.2	0.96	____
Methylene chloride(from Pharm. Industry)	0.44	0.96	____
Methyl ethyl ketone	0.05	0.75	____
Methyl isobutyl ketone	0.05	0.33	____
Nitrobenzene	0.65	0.125	____
Pyridine	1.12	0.33	____
Tetrachloroethylene	0.079	0.05	____
Toluene	1.12	0.33	____
1,1,1-Trichloroethane	1.05	0.41	____
1,1,2-Trichloroethane	0.03	7.6	____
1,1,2-Trichloro-1,2,2-trifluoroethane	1.05	0.96	____
Trichloroethylene	0.062	0.091	____
Trichlorofluoromethane	0.05	0.96	____
Xylene	0.05	0.15	____

California List Prohibited Wastes	Level (mg/l)	Treatment Standard	
Halogenated Organic Compounds	1000.0	Incineration	____
Arsenic (As) Nonwastewaters	500.0	None	____
Mercury (Hg) Nonwastewaters	20.0	None	____
Nickel (Ni)	134.0	None	____
Thallium (Tl)	130.0	None	____
Chlorinated Biphenyls (PCB's)	50.0	Incineration	____

Waste Descriptions and/or Treatment Subcategory		Treatment Standards Reference in 40 CFR and Technology Codes for 40 CFR 268.42(a)				Check All That Apply
Waste Code	Description	Wastewaters		Nonwastewaters		
D001:	Wastewaters (<1.0 wt% TOC and TSS)	268.42(a) DEACT	____	NA		
	Low TOC Ignitable Liquids (<10 wt% TOC)	NA		268.42(a) DEACT	X	
	High TOC Ignitable Liquids (>10 wt% TOC)	NA		268.42(a) RORGS, FSUBS, or INCIN	____	
D002	Corrosives, all subcategories & CA list	268.42(a) DEACT	____	268.42(a) DEACT	____	
D004	Arsenic (As)	268.43(a)	____	268.41(a)	____	Variance until 5-8-92
D005	Barium (Ba)	268.43(a)	____	268.41(a)	____	
D006	Cadmium (Cd)	268.43(a)	____	268.41(a)	____	
D007	Chromium (Cr)	268.43(a)	____	268.41(a)	____	
D008	Lead (Pb)	268.43(a)	____	268.41(a)	____	
D009:	Low Mercury Subcategory (<260 ppm Hg)	268.43(a)	____	268.41(a)	____	Variance until 5-8-92
	High Mercury Subcategory (>=260 ppm Hg)	268.43(a)	____	268.42(a) RMERC	____	Variance until 5-8-92
D010	Selenium (Se)	268.43(a)	____	268.41(a)	____	
D011	Silver (Ag)	268.43(a)	____	268.41(a)	____	
Other Codes	See attachment for supplemental list		____		____	

Generator Name: CERRO COPPER PRODUCTS Co. EPA ID: ILD060018914

Generator Representative Signature: Joe D. Burgess

Name & Title of Representative: Joe D. BURGESS, ENVIRON. ENGR.

Safety-Kleen Sample Number: 082248 Control Number: 0084138

NOTICE OF LAND DISPOSAL RESTRICTION OF WASTE

TO: SAFETY-KLEEN CORP. EPA ID NO: KYD053348108
STATE HWY 146
NEW CASTLE, KY. 40050

Under manifest number 00007 line number 11a. (enter 11a, 11b, 11c, OR 11d) the Generator noted below is shipping to you a waste determined to be restricted under 40 CFR Part 268. In accordance with 40 CFR 268.7, the generator hereby provides notice that the waste is restricted and the EPA waste code and the appropriate treatment standards are as follows:

EPA Waste Codes: D008 F001 D001, D005

F001-F005 Spent Solvents	TREATMENT STANDARDS (mg/l) Wastewater w/Solvents	All Other Solvent Wastes	Check All That Apply
Regulated Hazardous Constituent			
Acetone	0.05	0.59	
Benzene	0.07	3.7	
n-Butyl alcohol	5.0	5.0	
Carbon disulfide	1.05	4.81	
Carbon tetrachloride	0.05	0.96	
Chlorobenzene	0.15	0.05	
Cresols (and cresylic acid)	2.82	0.75	
Cyclohexanone	0.125	0.75	
1,2-Dichlorobenzene	0.66	0.125	
Ethyl acetate	0.05	0.75	
Ethyl benzene	0.05	0.053	
Ethyl ether	0.05	0.75	
Isobutanol	5.0	5.0	
Methanol	0.25	0.75	
Methylene chloride	0.2	0.96	
Methylene chloride(from Pharm. Industry)	0.44	0.96	
Methyl ethyl ketone	0.05	0.75	
Methyl isobutyl ketone	0.05	0.00	
Nitrobenzene	0.66	0.125	
Pyridine	1.12	0.33	
Tetrachloroethylene	0.079	0.05	
Toluene	1.12	0.33	
1,1,1-Trichloroethane	1.05	0.41	
1,1,2-Trichloroethane	0.03	7.6	
1,1,2-Trichloro-1,2,2-trifluoroethane	1.05	0.96	
Trichloroethylene	0.062	0.091	
Trichlorofluoromethane	0.05	0.96	
Xylene	0.05	0.15	

California List Prohibited Wastes	Level (mg/l)	Treatment Standard	
Halogenated Organic Compounds	1000.0	Incineration	
Arsenic (As) Nonwastewaters	500.0	None	
Mercury (Hg) Nonwastewaters	20.0	None	
Nickel (Ni)	134.0	None	
Thallium (Tl)	130.0	None	
Chlorinated Biphenyls (PCB's)	50.0	Incineration	

Waste Descriptions and/or Treatment Subcategory		Treatment Standards Reference in 40 CFR and Technology Codes for 40 CFR 268.42(a)				Check All That Apply
Waste Code	Description	Wastewaters		Nonwastewaters		
D001:	Wastewaters (<1.0 wt% TOC and TSS)	268.43(a) DEACT		NA		
	Low TOC Ignitable Liquids (<10 wt% TOC)	NA		268.42(a) DEACT		
	High TOC Ignitable Liquids (>10 wt% TOC)	NA		268.42(a) RORGS, FSUBS, or INCIN		X
D002	Corrosives, all subcategories & CA list	268.42(a) DEACT		268.42(a) DEACT		
D004	Arsenic (As)	268.43(a)		268.41(a)		Variance until 5-8-9
D005	Barium (Ba)	268.43(a)	X	268.41(a)		
D006	Cadmium (Cd)	268.43(a)		268.41(a)		
D007	Chromium (Cr)	268.43(a)		268.41(a)		
D008	Lead (Pb)	268.43(a)	X	268.41(a)		
D009:	Low Mercury Subcategory (<260 ppm Hg)	268.43(a)		268.41(a)		Variance until 5-8-9
	High Mercury Subcategory (>=260 ppm Hg)	268.43(a)		268.42(a) RMERC		Variance until 5-8-9
D010	Selenium (Se)	268.43(a)		268.41(a)		
D011	Silver (Ag)	268.43(a)		268.41(a)		
Other Codes	See attachment for supplemental list					

Generator Name: CERRO COPPER PRODUCTS CO. EPA ID: ILD000018814

Generator Representative Signature: [signature]

Name & Title of Representative: Joe D. Burroughs, Environ Engr.

Safety-Kleen Sample Number: 089922 Control Number: 006-89-5

NOTICE OF LAND DISPOSAL RESTRICTION OF WASTE

TO: SAFETY-KLEEN CORP EPA ID NO: KYD053348106

STATE HWY 168

NEW CASTLE KY 40050

Under manifest number 07008 line number 11A. (enter 11a, 11b, 11c, OR 11d) the Generator noted below is shipping to you a waste determined to be restricted under 40 CFR Part 268. In accordance with 40 CFR 268.7, the generator hereby provides notice that the waste is restricted and the EPA waste code and the appropriate treatment standards are as follows:

EPA Waste Codes: D001 D005 D006

F001-F005 Spent Solvents Regulated Hazardous Constituent	TREATMENT STANDARDS (mg/l) Wastewater w/Solvents	All Other Solvent Wastes	Check All That Apply
Acetone	0.05	0.59	___
Benzene	0.07	3.7	
n-Butyl alcohol	5.0	5.0	___
Carbon disulfide	1.05	4.81	___
Carbon tetrachloride	0.05	0.96	___
Chlorobenzene	0.15	0.05	___
Cresols (and cresylic acid)	2.82	0.75	___
Cyclohexanone	0.125	0.75	___
1,2 Dichlorobenzene	0.05	0.166	___
Ethyl acetate	0.05	0.75	___
Ethyl benzene	0.05	0.053	___
Ethyl ether	0.05	0.75	___
Isobutanol	5.0	5.0	___
Methanol	0.25	0.75	___
Methylene chloride	0.2	0.96	___
Methylene chloride(from Pharm. industry)	0.44	0.96	___
Methyl ethyl ketone	0.05	0.75	___
Methyl isobutyl ketone	0.05	0.33	___
Nitrobenzene	0.85	0.125	___
Pyridine	1.12	0.33	___
Tetrachloroethylene	0.079	0.05	___
Toluene	1.12	0.33	___
1,1,1-Trichloroethane	1.05	0.41	___
1,1,2-Trichloroethane	0.03	7.6	___
1,1,2-Trichloro-1,2,2-trifluoroethane	1.03	0.96	___
Trichloroethylene	0.562	0.541	___
Xylenes	0.05	0.33	___

Halogenated Organic Compounds	1000.0	Incineration	___
Arsenic (As) Nonwastewaters	500.0	None	___
Mercury (Hg) Nonwastewaters	25.0	None	___
Nickel (Ni)	110.0	none	___
Thallium (Tl)	130.0	None	___
Chlorinated Biphenyls (PCB's)	50.0	Incineration	___

Waste Liquids with Inorganic Impurities — Inorganic Solids Containing or Contaminated with Heavy Metals (F006, F019, D004 - D011) Treated to Meet 40 CFR 268.41(b) Treatment Standards

Waste Code	Description	Wastewaters		Nonwastewaters		
D001:	Wastewaters (<1.0 wt% TOC and TSS)	268.42(a) DEACT	___	NA		
	Low TOC Ignitable Liquids (<10 wt% TOC)	NA		268.42(a) DEACT		
	High TOC Ignitable Liquids (>10 wt% TOC)	NA		268.42(a) RORGC, RTOXC, or INCIN		X
D002	Corrosives, all subcategories & CA list	268.42(a) DEACT	___	268.42(a) DEACT	___	
D004	Arsenic (As)	268.43(a)	___	268.41(a)	___	Variance until 5-8-92
D005	Barium (Ba)	268.43(a)	X	268.41(a)	___	
D006	Cadmium (Cd)	268.43(a)	___	268.41(a)	___	
D007	Chromium (Cr)	268.43(a)	___	268.41(a)	___	
D008	Lead (Pb)	268.43(a)	X	268.41(a)	___	
D009:	Low Mercury Subcategory (<260 ppm Hg)	268.43(a)	___	268.41(a)	___	Variance until 5-8-92
	High Mercury Subcategory (>=260 ppm Hg)	268.43(a)	___	268.42(a) RMERC	___	Variance until 5 8 92
D010	Selenium (Se)	268.43(a)	___	268.41(a)	___	
D011	Silver (Ag)	268.43(a)	___	268.41(a)	___	
Other Codes	See attachment for supplemental list		___		___	

Generator Name: CERRO COPPER EPA ID: ILD060018914

Generator Representative Signature: [signature]

Name & Title of Representative: Bob D. Burroughs, Environ Engr.

Safety-Kleen Sample Number: 068822 Control Number: 0060298

NOV 30 '92 12:09 FROM NEW CASTLE

NOTICE OF LAND DISPOSAL RESTRICTION OF WASTE

TO: SAFETY-KLEEN CORP EPA ID NO: KYD063948198

STATE HWY 149

NEW CASTLE KY 40050

(IL4082150)

Under manifest number 08004 line number 11a (enter 11a, 11b, 11c, OR 11d) the Generator noted below is shipping to you a waste determined to be restricted under 40 CFR Part 268. In accordance with 40 CFR 268.7, the generator hereby provides notice that the waste is restricted and the EPA waste code and the appropriate treatment standards are as follows:

EPA Waste Codes: D001

F001-F005 Spent Solvents Regulated Hazardous Constituent	TREATMENT STANDARDS (mg/l) Wastewater w/Solvents	All Other Solvent Wastes	Check All That Apply
Acetone	0.05	0.59	___
Benzene	0.07	3.7	___
n-Butyl alcohol	5.0	5.0	___
Carbon disulfide	1.05	4.81	___
Carbon tetrachloride	0.05	0.96	___
Chlorobenzene	0.15	0.05	___
Cresols (and cresylic acid)	2.82	0.75	___
Cyclohexanone	0.125	0.75	___
1,2-Dichlorobenzene	0.68	0.125	___
Ethyl acetate	0.05	0.75	___
Ethyl benzene	0.05	0.053	___
Ethyl ether	0.05	0.75	___
Isobutanol	5.0	5.0	___
Methanol	0.25	0.75	___
Methylene chloride	0.2	0.96	___
Methylene chloride(from Pharm. Industry)	0.44	0.96	___
Methyl ethyl ketone	0.05	0.75	___
Methyl isobutyl ketone	0.05	0.33	___
Nitrobenzene	0.65	0.125	___
Pyridine	1.12	0.33	___
Tetrachloroethylene	0.079	0.05	___
Toluene	1.12	0.33	___
1,1,1-Trichloroethane	1.05	0.41	___
1,1,2-Trichloroethane	0.03	7.6	___
1,1,2-Trichloro-1,2,2-trifluoroethane	1.05	0.96	___
Trichloroethylene	0.062	0.091	___
Trichlorofluoromethane	0.05	0.96	___
Xylene	0.05	0.15	___

California List Prohibited Wastes	Level (mg/l)	Treatment Standard	
Halogenated Organic Compounds	1000.0	Incineration	___
Arsenic (As) Nonwastewaters	500.0	None	___
Mercury (Hg) Nonwastewaters	20.0	None	___
Nickel (Ni)	134.0	None	___
Thallium (Tl)	130.0	None	___
Chlorinated Biphenyls (PCB's)	50.0	Incineration	___

Waste Descriptions and/or Treatment Subcategory Waste Code Description	Treatment Standards Reference in 40 CFR and Technology Codes for 40 CFR 268.42(a) Wastewaters		Nonwastewaters		Check All That Apply
D001: Wastewaters (<1.0 wt% TOC and TSS)	268.42(a) DEACT	___	NA		
Low TOC Ignitable Liquids (<10 wt% TOC)	NA		268.42(a) DEACT	X	
High TOC Ignitable Liquids (>10 wt% TOC)	NA		268.42(a) RORGS, FSUBS, or INCIN	___	
D002 Corrosives, all subcategories & CA list	268.42(a) DEACT	___	268.42(a) DEACT	___	
D004 Arsenic (As)	268.43(a)	___	268.41(a)	___	Variance until 5-8-92
D005 Barium (Ba)	268.43(a)	___	268.41(a)	___	
D006 Cadmium (Cd)	268.43(a)	___	268.41(a)	___	
D007 Chromium (Cr)	268.43(a)	___	268.41(a)	___	
D008 Lead (Pb)	268.43(a)	___	268.41(a)	___	
D009: Low Mercury Subcategory (<260 ppm Hg)	268.43(a)	___	268.41(a)	___	Variance until 5-8-92
High Mercury Subcategory (>=260 ppm Hg)	268.43(a)	___	268.42(a) RMERC	___	Variance until 5-8-92
D010 Selenium (Se)	268.43(a)	___	268.41(a)	___	
D011 Silver (Ag)	268.43(a)	___	268.41(a)	___	
Other Codes See attachment for supplemental list		___		___	

Generator Name: CERRO COPPER EPA ID: ILD080018814

Generator Representative Signature: Joe D. Burroughs

Name & Title of Representative: Joe D. Burroughs, Environ. Engr.

Safety-Kleen Sample Number: 082248 Control Number: 0084138

NOV 30 '92 12:07 FROM NEW CASTLE

NOTICE OF LAND DISPOSAL RESTRICTION OF WASTE

TO: SAFETY-KLEEN CORP
STATE HWY 146
NEW CASTLE KY 40050

EPA ID NO: KYD053945190

(IL 4456952 - Illinois No.)

Under manifest number 00011 line number 11a (enter 11a, 11b, 11c, OR 11d) the Generator noted below is shipping to you a waste determined to be restricted under 40 CFR Part 268. In accordance with 40 CFR 268.7, the generator hereby provides notice that the waste is restricted and the EPA waste code and the appropriate treatment standards are as follows:

EPA Waste Codes: D001

F001-F005 Spent Solvents	TREATMENT STANDARDS (mg/l) Wastewater w/Solvents	All Other Solvent Wastes	Check All That Apply
Regulated Hazardous Constituent			
Acetone	0.05	0.59	
Benzene	0.07	3.7	
n-Butyl alcohol	5.0	5.0	
Carbon disulfide	1.05	4.81	
Carbon tetrachloride	0.05	0.96	
Chlorobenzene	0.15	0.05	
Cresols (and cresylic acid)	2.82	0.75	
Cyclohexanone	0.125	0.75	
1,2-Dichlorobenzene	0.125	0.125	
Ethyl acetate	0.68	0.75	
Ethyl benzene	0.05	0.053	
Ethyl ether	0.05	0.75	
Isobutanol	0.05	5.0	
Methanol	5.0	0.75	
Methylene chloride	0.25	0.96	
Methylene chloride(from Pharm. Industry)	0.2	0.96	
Methyl ethyl ketone	0.44	0.75	
Methyl isobutyl ketone	0.05	0.33	
Nitrobenzene	0.05	0.125	
Pyridine	0.65	0.33	
Tetrachloroethylene	1.12	0.05	
Toluene	0.079	0.33	
1,1,1-Trichloroethane	1.12	0.41	
1,1,2-Trichloroethane	1.05	7.6	
1,1,2-Trichloro-1,2,2-trifluoroethane	0.03	0.96	
Trichloroethylene	1.05	0.081	
Trichlorofluoromethane	0.062	0.96	
Xylene	0.05	0.15	
	0.05		

California List Prohibited Wastes	Level (mg/l)	Treatment Standard	
Halogenated Organic Compounds	1000.0	Incineration	
Arsenic (As) Nonwastewaters	500.0	None	
Mercury (Hg) Nonwastewaters	20.0	None	
Nickel (Ni)	134.0	None	
Thallium (Tl)	130.0	None	
Chlorinated Biphenyls (PCB's)	50.0	Incineration	

Waste Descriptions and/or Treatment Subcategory		Treatment Standards Reference in 40 CFR and Technology Codes for 40 CFR 268.42(a) Wastewaters		Nonwastewaters		Check All That Apply
Waste Code	Description					
D001:	Wastewaters (<1.0 wt% TOC and TSS)	268.42(a) DEACT		NA		
	Low TOC Ignitable Liquids (<10 wt% TOC)	NA		268.42(a) DEACT	X	
	High TOC Ignitable Liquids (>10 wt% TOC)	NA		268.42(a) RORGS, FSUBS, or INCIN		
	Corrosives, all subcategories & CA list	268.42(a) DEACT		268.42(a) DEACT		Variance until 5-8
D002	Arsenic (As)	268.43(a)		268.41(a)		
D004	Barium (Ba)	268.43(a)		268.41(a)		
D005	Cadmium (Cd)	268.43(a)		268.41(a)		
D006	Chromium (Cr)	268.43(a)		268.41(a)		
D007	Lead (Pb)	268.43(a)		268.41(a)		Variance until 5-
D008	Low Mercury Subcategory (<260 ppm Hg)	268.43(a)		268.41(a)		Variance until 5-
D009:	High Mercury Subcategory (>=260 ppm Hg)	268.43(a)		268.42(a) RMERC		
	Selenium (Se)	268.43(a)		268.41(a)		
D010	Silver (Ag)			268.41(a)		
D011						

Other Codes See attachment for supplemental list

Generator Name: CERRO COPPER

EPA ID: ILD060018914

Generator Representative Signature:

Name & Title of Representative: Jack D. Burroughs, Environ. Engr.

Safety-Kleen Sample Number: 093248

Control Number: 0084138

NOTICE OF LAND DISPOSAL RESTRICTION OF WASTE

TO: [illegible]-KLEEN CORP EPA ID NO: KYD053348106

STATE HWY 146

NEW CASTLE KY 40050

Under manifest number 00013 line number 11a (enter 11a, 11b, 11c, OR 11d) the Generator noted below is shipping to you a waste determined to be restricted under 40 CRF Part 268. In accordance with 40 CFR 268.7, the generator hereby provides notice that the waste is restricted and the EPA waste code and the appropriate treatment standards are as follows:

EPA Waste Codes: D001 D005 D006

F001-F005 Spent Solvents	TREATMENT STANDARDS (mg/l) Wastewater w/Solvents	All Other Solvent Wastes	Check All That Apply
Regulated Hazardous Constituent			
Acetone	0.05	0.59	
Benzene	0.07	3.7	
n-Butyl alcohol	5.0	5.0	
Carbon disulfide	1.05	4.81	
Carbon tetrachloride	0.05	0.96	
Chlorobenzene	0.15	0.05	
Cresols (and cresylic acid)	2.82	0.75	
Cyclohexanone	0.125	0.75	
1,2-Dichlorobenzene	0.68	0.125	
Ethyl acetate	0.05	0.75	
Ethyl benzene	0.05	0.053	
Ethyl ether	0.05	0.75	
Isobutanol	5.0	5.0	
Methanol	0.25	0.75	
Methylene chloride	0.2	0.96	
Methylene chloride(from Pharm. Industry)	0.44	0.96	
Methyl ethyl ketone	0.05	0.75	
Methyl isobutyl ketone	0.05	0.33	
Nitrobenzene	0.65	0.125	
Pyridine	1.12	0.33	
Tetrachloroethylene	0.079	0.05	
Toluene	1.12	0.33	
1,1,1-Trichloroethane	1.05	0.41	
1,1,2-Trichloroethane	0.03	7.6	
1,1,2-Trichloro-1,2,2-trifluoroethane	1.05	0.96	
Trichloroethylene	0.062	0.091	
Trichlorofluoromethane	0.05	0.96	
Xylene	0.05	0.15	

California List Prohibited Wastes	Level (mg/l)	Treatment Standard	
Halogenated Organic Compounds	1000.0	Incineration	
Arsenic (As) Nonwastewaters	500.0	None	
Mercury (Hg) Nonwastewaters	20.0	None	
Nickel (Ni)	134.0	None	
Thallium (Tl)	130.0	None	
Chlorinated Biphenyls (PCB's)	50.0	Incineration	

Waste Codes	Waste Descriptions and/or Treatment Subcategory	Treatment Standards Reference in 40 CFR and Technology Codes for 40 CFR 268.42(a) Wastewaters		Nonwastewaters		Check All That Apply
D001:	Wastewaters (<1.0 wt% TOC and TSS)	268.42(a) DEACT		NA		
	Low TOC Ignitable Liquids (<10 wt% TOC)	NA		268.42(a) DEACT		
	High TOC Ignitable Liquids (>10 wt% TOC)	NA		268.42(a) RORGS, FSUBS, or INCIN		X
D002	Corrosives, all subcategories & CA list	268.42(a) DEACT		268.42(a) DEACT		
D004	Arsenic (As)	268.43(a)		268.41(a)		Variance until 5-8-92
D005	Barium (Ba)	268.43(a)	X	268.41(a)		
D006	Cadmium (Cd)	268.43(a)		268.41(a)		
D007	Chromium (Cr)	268.43(a)		268.41(a)		
D008	Lead (Pb)	268.43(a)	X	268.41(a)		
D009:	Low Mercury Subcategory (<260 ppm Hg)	268.43(a)		268.41(a)		Variance until 5-8-92
	High Mercury Subcategory (>=260 ppm Hg)	268.43(a)		268.42(a) RMERC		Variance until 5-8-92
D010	Selenium (Se)	268.43(a)		268.41(a)		
D011	Silver (Ag)	268.43(a)		268.41(a)		
Other Codes	See attachment for supplemental list					

Generator Name: CERRO COPPER EPA ID: ILD080018814

Generator Representative Signature: John W. Stephens

Name & Title of Representative: JOHN W. STEPHENS ENVIR. ENGR.

Safety-Kleen Sample Number: 089822 Control Number: 0060288

NOV 30 '92 12:04 FROM NEW CASTLE

NOTIFICATION AND CERTIFICATION

OF LAND DISPOSAL RESTRICTION OF WASTE

[redacted]

EPA ID NO: KYD053348108

SAFETY-KLEEN CORP.
STATE HIGHWAY 146
NEW CASTLE, KY 40050

KY 40050

IL WL6968

Manifest number 00014 line number 11a. (enter 11a, 11b, 11c, OR 11d) the waste listed below is shipping to you a waste determined to be restricted under 40 CRF Part 268. In accordance with 40 CFR 268.7, the generator hereby provides notice that the waste is restricted and the EPA waste code and the appropriate treatment standards are as follows:

Waste Codes: D001

F001-F005 Spent Solvents Regulated Hazardous Constituent	TREATMENT STANDARDS (mg/l) Wastewater w/Solvents	All Other Solvent Wastes	Check All That Apply
Acetone	0.05	0.59	____
Benzene	0.07	0.14	____
n-Butyl alcohol	5.0	5.0	____
Carbon disulfide	1.05	3.81	____
Carbon tetrachloride	0.05	0.96	____
Chlorobenzene	0.15	0.05	____
Cresols (and cresylic acid)	0.02	0.75	____
Cyclohexanone	0.125	0.75	____
1,2-Dichlorobenzene	0.63	0.125	____
Ethyl acetate	0.05	0.75	____
Ethyl benzene	0.05	0.053	____
Ethyl ether	0.05	0.75	____
Isobutanol	5.0	5.0	____
Methanol	0.25	0.75	____
Methylene chloride	0.2	0.96	____
Methylene chloride(from Pharm. Industry)	0.44	0.96	____
Methyl ethyl ketone	0.05	0.75	____
Methyl isobutyl ketone	0.05	0.33	____
Nitrobenzene	0.65	0.125	____
Pyridine	1.12	0.33	____
Tetrachloroethylene	0.079	0.05	____
Toluene	1.12	0.33	____
1,1,1-Trichloroethane	1.05	0.41	____
1,1,2-Trichloroethane	0.03	7.6	____
1,1,2-Trichloro-1,2,2-trifluoroethane	1.05	0.96	____
Trichloroethylene	0.062	0.091	____
Trichlorofluoromethane	0.05	0.96	____
Xylene	0.05	0.15	____

California List Prohibited Wastes	Level (mg/l)	Treatment Standard	
Halogenated Organic Compounds	1000.0	Incineration	____
Arsenic (As) Nonwastewaters	500.0	None	____
Mercury (Hg) Nonwastewaters	20.0	None	____
Nickel (Ni)	134.0	None	____
Thallium (Tl)	130.0	None	____
Chlorinated Biphenyls (PCB's)	50.0	Incineration	____

These treatment standards do not preclude solvent recovery prior to disposal. Subsequent disposal of unrecovered waste is subject to these standards.

Waste Descriptions and/or Treatment Subcategory Waste Code Description	Treatment Standards Reference in 40 CFR and Technology Codes for 40 CFR 268.42(a) Wastewaters		Nonwastewaters		Check All That Apply
D001:	Wastewaters (<1.0 wt% TOC and TSS)	268.42(a) DEACT	____	NA	____
	Low TOC Ignitable Liquids (<10 wt% TOC)	NA		268.42(a) DEACT	____
	High TOC Ignitable Liquids (>10 wt% TOC)	NA		268.42(a) RORGS, PSUBS, or INCIN	X
D002	[illegible]	268.42(a) DEACT	____	268.42(a) DEACT	____
D004	Arsenic (As)	268.43(a)	____	268.41(a)	____ Variance until 5-8-92
D005	Barium (Ba)	268.43(a)	____	268.41(a)	____
D006	Cadmium (Cd)	268.43(a)	____	268.41(a)	____
D007	Chromium (Cr)	268.43(a)	____	268.41(a)	____
D008	Lead (Pb)	268.43(a)	____	268.41(a)	____
D009:	Low Mercury Subcategory (<260 ppm Hg)	268.43(a)	____	268.41(a)	____ Variance until 5-8-92
	High Mercury Subcategory (>=260 ppm Hg)	268.43(a)	____	268.42(a) RMERC	____ Variance until 5-8-92
D010	Selenium (Se)	268.43(a)	____	268.41(a)	____
D011	Silver (Ag)	268.43(a)	____	268.41(a)	____
Other Codes	See attachment for supplemental list		____		____

Generator Name: CERRO COPPER EPA ID: ILD080018914

Generator Representative Signature: [signature]

Name & Title of Representative: ENVIRON. ENGR. - JOE D. BURROUGHS

Safety-Kleen Sample Number: 225534 Control Number: 0097328

NOTE: The USEPA has not determined treatment standards for the new TCLP EPA Waste Numbers: D018 through D043.

CERRO COPPER PRODUCTS CO.
P.O. Box 66800
St. Louis, MO 63166-6800
618/337-6000

Certified Mail

December 3, 1992

Ms. Deanne Virgin
Compliance Unit
Planning and Reporting Section
Illinois Environmental Protection Agency
2200 Churchill Road
P.O. Box 19276
Springfield, Illinois 62794-9276

Re: Response to Compliance Inquiry Letter
1631210008-St. Clair County
Cerro Copper Products Co
Sauget, Illinois
ILD080018914

Dear Ms. Virgin:

In response to your November 19, 1992 Compliance Inquiry Letter, enclosed you will find two copies of Cerro's explanation and documentation of compliance to the alleged violations noted during the IEPA's October 20, 1992 inspection.

I. 35 Ill. Adm. Code 722.134 (a)(2)&(3) - Unlabeled Drums

Cerro recognizes that there were two drums stored in the contaminated waste oil storage area which were not properly labeled. Apparently the labels had fallen off, since one of the labels was found on the ground near the drums. Cerro plans to reinforce the importance of labeling with those employees responsible for the storage area. The storage procedures will be posted in the storage area office for frequent review by employees and a sign will be erected outlining the storage requirements including labeling requirements as a reminder. A copy of the posted procedures and a draft of the wording on the sign are found in Appendix A. The sign is expected to be completed by 12/15/92.

II. 35 Ill. Adm. Code 725.152(c) - Contingency Plan Arrangements with Local Hospitals

A copy of the Contingency, Emergency Response & Preparedness Plan is found in Appendix B. The hospital emergency arrangements during medical emergencies is outlined in Section IV, page 3 of the Plan. Cerro has a nurse on staff and a well equipped medical dispensary on its premises.

III. 35 Ill. Adm. Code 725.152(e) - Emergency Equipment Included In Contingency Plan

A copy of the updated Contingency Plan showing the location and

type of emergency equipment is found in Appendix B.

IV. 35 Ill. Adm. Code 725.153(b) - Contingency Plan Copy to the Police, Fire Dept., Hospitals and Local Emergency Coordinator

Cerro's Contingency, Emergency Response & Preparedness Plan was submitted to those agencies listed above on October, 26, 1992. Documentation of receipt is found in Appendix C.

V. 35 Ill. Adm. Code 725.294 - Hazardous Waste Oil Tank Freeboard And Spill Control

A high level alarm system will be installed by 1/1/93 to prevent the overfilling of the waste oil tank and to indicate to the operator that filling is to be discontinued to allow for free-board. This open topped tank is filled manually without the use of pumps. To prevent the unauthorized filling of the tank and to keep windblown rain from causing overflow, a metal door will be installed along the west side of the tank. The installation of the door is expected to be completed by 1/15/92, weather permitting.

VI. 35 Ill. Adm. Code 725.295(a) - Hazardous Waste Oil Tank Daily Inspections

A copy of the revised hazardous waste storage daily inspection form is found in Appendix D. The new form covers those items in 725.295(a)(1-4). The usage of the new inspection began on 12/3/92.

VII. 35 Ill. Adm. Code 728.107(a)(6) - Land Ban Certification On-Site Copies Retention

A copy of the Land Disposal Restriction notification forms for those missing form our files have been obtained from the disposal site. Copies are found in Appendix E.

If your should have any questions, please do not hesitate to phone this office.

Very truly yours,

CERRO COPPER PRODUCTS CO

Joseph M. Grana
Manager of Environmental
Energy Affairs

cc: Chris Cahnovsky (IEPA-Collinsville)

bcc: P. Tandler (w/o attachments)
R. E. Conreaux " "
J. D. Burroughs (w/attachments)
[redacted] "

APPENDIX A

DRUM STORAGE PROCEDURES

HAZARDOUS WASTE STORAGE AREA REQUIREMENTS

Cerro is allowed to store hazardous waste for a period not to exceed 90 days without having a permit. However the guidelines below must be followed for the storage area.

A. Contaminated Waste Oil Tank

1. The contaminated waste oil tank containment area must be maintained free of oil.

2. Daily inspections must be made and recorded daily.

3. If a spill should occur into the containment the material must be removed within 24 hours.

4. The tank and/or the area around the tank must be clearly marked "Hazardous Waste". (265.34(a)(3)

5. The spill and overflow alarm system must be in working order.

6. The tank must not be leaking or rusting and must never be overfilled.

B. Drum Storage

1. All drums holding hazardous waste must be in good condition. Leaking containers must have their contents transferred to another container.

2. A drums holding hazardous waste must always be closed except when removing or adding waste.

3. A drums holding hazardous waste must not be handled in such a way as to cause it to rupture or leak. Do not stack more than two high and always use pallets when stacking.

4. The drum storage area must be inspected weekly.

5. The date upon which accumulation begins must be clearly marked on the drum. This date is the date the waste is placed in the storage area after using the Chlorine test kit to determine if it is contaminated with solvent.

6. The drums is clearly marked "Hazardous Waste". Use the red labels provided. Clean the area to be labeled because it will not stick to an oily surface. Remove the label once the waste is removed from the drum.

APPENDIX B

CONTINGENCY, EMERGENCY RESPONSE & PREPAREDNESS PLAN